Progress Update in Response to Recommendations in ONR Fukushima Interim / Final Reports, Dutyholder Considerations and Stress Test Findings in ONR Nuclear Power Plant and non-Power Generating Nuclear Facilities Reports – June 2012

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| IR-01 | The Government should approach IAEA, in co-operation with others, to ensure that improved arrangements are in place for the dissemination of timely authoritative information relevant to a nuclear event anywhere in the world. 
This information should include:
  a) basic data about the reactor design including reactor type, containment, thermal power, protection systems, operating history and condition of any nuclear materials such as spent fuel stored on the site should be held permanently in a central library maintained on behalf of the international community; and
  b) data on accident progression and the prognosis for future accident development. The operator would provide such information as is available to its national authorities. International mechanisms for communicating this information between national governments should be strengthened. To ensure that priority is given to relevant information, international agreement should be sought on the type of information that needs to be provided. |

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
Nuclear facilities on the licensed site at Rosyth are incapable of sustaining a severe accident and so the outcome of this work is likely to have only limited relevance.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
This is essentially a matter for Government. However, RRDL supports the dissemination of timely authoritative information relevant to a nuclear event. We anticipate that the goal of this recommendation is further strengthening of such arrangements in the UK.

4 Progress to date
As a responsible operator, we maintain a comprehensive emergency plan for the nuclear licence site. Even though the consequences of an accident do not extend sufficiently to affect the public, we maintain effective lines of communication with relevant authorities. Disseminated information on major events would be examined for any implications for operations on the Nuclear Licensed Site.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
Not applicable
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<td>6</td>
<td>If the finding is not closed, plans for closure including justification of timescales</td>
<td>Not applicable.</td>
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<td>7</td>
<td>For non-closed findings, key milestones and programme</td>
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<tr>
<td>IR-02</td>
<td>The Government should consider carrying out a review of the Japanese response to the emergency to identify any lessons for UK public contingency planning for widespread emergencies, taking account of any social, cultural and organisational differences.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - Even though the consequences of an accident on the Nuclear Licensed Site do not extend sufficiently to affect the public, any changes to UK public contingency planning that have resonance with RRDL’s Emergency Plans will need to be understood and effectively incorporated in the company's arrangements.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - This is essentially a matter for Government. However, RRDL supports the development of robust, well-understood and effective emergency response planning, which has clear linkage from industry, through all partner bodies and to Government. We anticipate that the goal of this recommendation is further strengthening of such arrangements in the UK.

4. **Progress to date**
   - RRDL is fully engaged with the relevant regulatory bodies and government departments to support the development of improved processes. This includes work with DECC (Civil Nuclear Emergency Planning & Response) to support the development and delivery of a revised national strategic framework.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - An overall view on 'closure' is essentially a matter for Government. RRDL considers that this recommendation may be moved to 'normal business', as the required links with Government are in place and are active.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - Not applicable.

7. **For non-closed findings, key milestones and programme**
   - Not applicable.
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<tr>
<td>IR-03</td>
<td>The Nuclear Emergency Planning Liaison Group (NEPLG) should instigate a review of the UK’s national nuclear emergency arrangements in the light of the experience of dealing with the prolonged Japanese event.</td>
</tr>
</tbody>
</table>

1. Does the Submitting Body agree with the finding?  
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance  
   RRDL’s Emergency Plans need to function effectively within the local and national context. RRDL does not participate directly in the NEPLG but is cognisant of the work of Group through the Ministry of Defence which represents all defence-related sites. Recommendations arising from the NEPLG review would be incorporated into the Nuclear Licensed Site Emergency Plan.

3. What is the desired functional outcome and what will be achieved by addressing the issue?  
   This is essentially a matter for NEPLG. However, RRDL supports the development of robust, well-understood and effective emergency response planning, which has clear linkage from industry, through all partner bodies and to Government. We anticipate that the goal of this recommendation is further strengthening of such arrangements in the UK.

4. Progress to date  
   The MoD is engaged with the NEPLG, the relevant regulatory bodies and other government departments to support the development of improved processes. This includes work with DECC (Civil Nuclear Emergency Planning & Response) to support the development and delivery of a revised national strategic framework. RRDL works closely within the nuclear industry to ensure a consistent best practice response across the UK in this respect.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?  
   An overall view on ‘closure’ is essentially a matter for NEPLG. RRDL considers that this recommendation may be moved to ‘normal business’, as the required links with Government are in place and are active.

6. If the finding is not closed, plans for closure including justification of timescales  
   Not applicable.

7. For non-closed findings, key milestones and programme  
   Not applicable.
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<tr>
<td>IR-04</td>
<td>Both the UK nuclear industry and ONR should consider ways of enhancing the drive to ensure more open, transparent and trusted communications, and relationships, with the public and other stakeholders.</td>
</tr>
</tbody>
</table>

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
RRDL has long maintained a policy of maintaining open communications with public authorities and continues to do so through its Local Liaison Committee, which is the local stakeholder group at Rosyth. Recommendations arising from a co-operative review by the UK nuclear industry and ONR into ways of achieving openness and transparency would be favourably considered by the licensee.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
RRDL supports the principle of open and transparent communications by government, regulatory and public bodies with a view to improving the reputation of the nuclear industry and the trust of the public.

4 Progress to date
RRDL keeps public authorities informed of all significant evolutions affecting nuclear operations and nuclear safety on its site.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
No.

6 If the finding is not closed, plans for closure including justification of timescales
To be determined by ONR.

7 For non-closed findings, key milestones and programme
To be determined by ONR.
Recommendation / Consideration / STF No. | Recommendation / Consideration / Stress Test Finding Text
---|---
IR-05 | Once further detailed information is available and studies are completed, ONR should undertake a formal review of the Safety Assessment Principles to determine whether any additional guidance is necessary in the light of the Fukushima accident, particularly for "cliff-edge" effects. The review of ONR's Safety Assessment Principles (SAP should also cover ONR's Technical Assessment Guides (TAG), including external hazards.

1 | Does the Submitting Body agree with the finding? Yes.
2 | How does this apply to the Submitting Body? Describe the level of relevance RRDL recognises ONR's SAPS and regulatory assessment expectations in determining its own targets and acceptance criteria. Industry participation in such a review would be welcomed and relevant amendments to SAPs would be adopted.
3 | What is the desired functional outcome and what will be achieved by addressing the issue? RRDL anticipates that the BDB assessment advances the principle of ALARP and industry's compliance with it.
4 | Progress to date Not applicable.
5 | Is the finding considered closed by the Submitting body and if so the justification for closure? No.
6 | If the finding is not closed, plans for closure including justification of timescales To be determined by ONR.
7 | For non-closed findings, key milestones and programme To be determined by ONR.
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| IR-06                                   | ONR should consider to what extent long-term severe accidents can and should be covered by the programme of emergency exercises overseen by the regulator.  
This should include:  
a) evaluation of how changes to exercise scenarios supported by longer exercise duration will permit exercising in real time such matters as hand-over arrangements, etc.;  
b) how automatic decisions taken to protect the public can be confirmed and supported by plant damage control data; and  
c) recommendations on what should be included in an appropriate UK exercise programme for testing nuclear emergency plans, with relevant guidance provided to Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPIR) duty holders. |

1 Does the Submitting Body agree with the finding?  
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance  
Not applicable. The scale of hazard on the Nuclear Licensed Site can not give rise to a severe accident.

3 What is the desired functional outcome and what will be achieved by addressing the issue?  
Not applicable.

4 Progress to date  
Not applicable.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?  
Not applicable.

6 If the finding is not closed, plans for closure including justification of timescales  
Not applicable.

7 For non-closed findings, key milestones and programme  
Not applicable.
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| IR-07                                  | ONR should review the arrangements for regulatory response to potential severe accidents in the UK to see whether more should be done to prepare for such very remote events.  
  
  This should include:  
  
a) enhancing access during an accident to relevant, current plant data on the status of critical safety functions, i.e. the control of criticality, cooling and containment, and releases of radioactivity to the environment, as it would greatly improve ONR's capability to provide independent advice to the authorities in the event of a severe accident; and  
b) review of the basic plant data needed by ONR - this has much in common with what we suggest should be held by an international organisation under Recommendation IR-1. |

1 Does the Submitting Body agree with the finding?  
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance  
Not applicable. The scale of hazard on the Nuclear Licensed Site can not give rise to a severe accident.

3 What is the desired functional outcome and what will be achieved by addressing the issue?  
Not applicable.

4 Progress to date  
Not applicable.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?  
Not applicable.

6 If the finding is not closed, plans for closure including justification of timescales  
Not applicable.

7 For non-closed findings, key milestones and programme  
Not applicable.
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<tr>
<td>IR-08</td>
<td>The UK nuclear industry should review the dependency of nuclear safety on off-site infrastructure in extreme conditions, and consider whether enhancements are necessary to sites' self sufficiency given for the reliability of the grid under such extreme circumstances. This should include: essential supplies such as food, water, conventional fuels, compressed gases and staff, as well as the safe off-site storage of any equipment that may be needed to support the site response to an accident; and timescales required to transfer supplies or equipment to site.</td>
</tr>
</tbody>
</table>

1 Does the Submitting Body agree with the finding?

Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance

RRDL is not dependent upon the reliability of the grid and supplies of food, water, conventional fuels, compressed gases, etc to preserve the safety of radioactive materials at Rosyth, or to effect a sufficient response to an emergency, and has adequate alternative arrangements in place to call up replacement vital equipment and staff, the relevance of this recommendation is low.

3 What is the desired functional outcome and what will be achieved by addressing the issue?

No specific action is necessary.

4 Progress to date

RRDL works closely within the nuclear industry to ensure a consistent best practice response across the UK in this respect and periodically reviews its arrangements accordingly.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?

Yes, for the reasons given in 2 above. For the range of consequences that could arise as a result of an extreme event affecting radioactive material at Rosyth, an extended delay in receiving assistance from national or corporate infrastructure would be tolerable.

6 If the finding is not closed, plans for closure including justification of timescales

Not applicable.

7 For non-closed findings, key milestones and programme

Not applicable.
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<td>IR-09</td>
<td>Once further relevant information becomes available, the UK nuclear industry should review what lessons can be learnt from the comparison of the events at the Fukushima-1 (Fukushima Dai-ichi) and Fukushima-2 (Fukushima Dai-ni) sites.</td>
</tr>
</tbody>
</table>

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   As operations at Rosyth do not involve heat-producing nuclear material, the range of accidents that might arise following an extreme event at Rosyth do not compare with the accident at Fukushima in scale, controllability or consequences. So lessons arising from the Fukushima plants may have only limited application. Nevertheless, any changes to UK public contingency planning that have resonance with RRDL’s Emergency Plans will need to be understood and effectively incorporated in the company’s arrangements. The licensee will review information relating to the events at the Fukushima-1 and Fukushima-2 plant when it becomes available and consider what lessons can be learnt for the continuing safety of operations at Rosyth.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   RRDL supports the development of robust, well-understood and effective emergency response planning, which has clear linkage from industry, through all partner bodies and to Government. RRDL anticipates that the goal of this recommendation is further strengthening of such arrangements in the UK.

4. Progress to date
   RRDL is fully engaged with other participants in the nuclear industry and with relevant regulatory bodies and government departments, and is supporting the development of improved processes.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   No.

6. If the finding is not closed, plans for closure including justification of timescales
   This recommendation will remain open while relevant information on the events at Fukushima and developments in resilience arrangements evolve.

7. For non-closed findings, key milestones and programme
   Not applicable.
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<td>IR-10</td>
<td>The UK nuclear industry should initiate a review of flooding studies, including from tsunamis, in light of the Japanese experience, to confirm the design basis and margins for flooding at UK nuclear sites, and whether there is a need to improve further site-specific flood risk assessments as part of the periodic safety review programme, and for any new reactors. This should include sea-level protection.</td>
</tr>
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</table>

1 **Does the Submitting Body agree with the finding?**

Yes. However, to ensure consistence of approach and avoid the potentially unreasonable escalation of public expenditure the review of flooding studies should be sponsored by the government and subscribed to jointly by the nuclear industry and the regulating authorities. The outcome of this review should inform ONR’s review of its Safety Assessment Principles (Recommendation IR-05).

2 **How does this apply to the Submitting Body? Describe the level of relevance**

It is recognised that the tsunami in Japan caused severe difficulties for the Fukushima 1 plant and hence it is appropriate for the industry to review flooding studies to confirm that the design basis and margins are maintained commensurately with current knowledge.

RRDL’s site is in a coastal location and could therefore be vulnerable to flooding due to extreme weather or from seismically induced tsunamis. As a dockyard port, the site can have no practical defences against flooding but and the facilities for accommodating radioactive materials will withstand excessive static or dynamic flooding. The recommendation is only marginally relevant.

3 **What is the desired functional outcome and what will be achieved by addressing the issue?**

RRDL anticipates that the goal of this recommendation is to further strengthen the resilience of nuclear sites in the UK. However, because the facilities for accommodating radioactive materials are already capable of withstanding deep submergence, it is unlikely that they will be relevant to Rosyth.

4 **Progress to date**

RRDL works closely within the nuclear industry to ensure a consistent best practice response across the UK in this respect and periodically reviews its arrangements accordingly.

5 **Is the finding considered closed by the Submitting body and if so the justification for closure?**

Yes. Radioactive materials at Rosyth will withstand deep submersion and flooding will
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<tr>
<th>Security Classification</th>
<th>Submitting body/Licensee</th>
<th>Issue Control</th>
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<tbody>
<tr>
<td>No Marking Required</td>
<td>Rosyth Royal Dockyard Ltd</td>
<td>Issue: 1</td>
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<td>26th June 2012</td>
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<tr>
<td>IR-11</td>
<td>The UK nuclear industry should ensure that safety cases for new sites for multiple reactors adequately demonstrate the capability for dealing with multiple serious concurrent events induced by extreme off-site hazards.</td>
</tr>
</tbody>
</table>

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   RRDL does not operate reactors and does not have multiple facilities capable of serious concurrent events. Nor is it planning to have multiple reactors at Rosyth in the future.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   Not applicable.

4. Progress to date
   Not applicable.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   Not applicable.

6. If the finding is not closed, plans for closure including justification of timescales
   Not applicable.

7. For non-closed findings, key milestones and programme
   Not applicable.
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<tr>
<td>IR-12</td>
<td>The UK nuclear industry should ensure the adequacy of any new spent fuel strategies compared with the expectations in the Safety Assessment Principles of passive safety and good engineering practice. <em>Existing licensees are expected to review their current spent fuel strategies as part of their periodic review processes and make any reasonably practicable improvements, noting that any intended changes need to take account of wider strategic factors including the implications for the nuclear fuel cycle.</em></td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - Not applicable. There is no nuclear fuel at Rosyth and no prospect of operations involving nuclear fuel.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - Not applicable.

4. **Progress to date**
   - Not applicable.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - Yes, for the reasons given in 2 above.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - Not applicable.

7. **For non-closed findings, key milestones and programme**
   - Not applicable.
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<td>IR-13</td>
<td>The UK nuclear industry should review the plant and site layouts of existing plants and any proposed new designs to ensure that safety systems and their essential supplies and controls have adequate robustness against severe flooding and other extreme external events.</td>
</tr>
</tbody>
</table>

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   RRDL’s site is in a coastal location and the facilities for accommodating radioactive materials will withstand excessive static or dynamic flooding and other extreme events without resulting risking a severe accident. They are not dependent upon dynamic safety systems or essential supplies, nor are they located such that access to them following an extreme event would be prevented. There are no intentions to construct new facilities that might require resilience to extreme events. The recommendation is not applicable to Rosyth.
   Nevertheless, the licensee will review the plant and site layouts of any proposed new designs, if any arise in the future, to ensure that safety systems and their essential supplies and controls have adequate robustness against severe flooding and other extreme external events.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   Not applicable.

4. Progress to date
   Not applicable.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   Yes, for the reasons given in 2 above.

6. If the finding is not closed, plans for closure including justification of timescales
   Not applicable.

7. For non-closed findings, key milestones and programme
   Not applicable.
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<tr>
<td>IR-14</td>
<td>The UK nuclear industry should ensure that the design of new spent fuel ponds close to reactors minimises the need for bottom penetrations and lines that are prone to siphoning faults. Any that are necessary should be as robust to faults as are the ponds themselves.</td>
</tr>
</tbody>
</table>

1 Does the Submitting Body agree with the finding? 
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance 
Not applicable. There are no nuclear fuel facilities at Rosyth and no prospect of operations involving nuclear fuel.

3 What is the desired functional outcome and what will be achieved by addressing the issue? 
Not applicable.

4 Progress to date 
Not applicable.

5 Is the finding considered closed by the Submitting body and if so the justification for closure? 
Yes, for the reason given in 2 above.

6 If the finding is not closed, plans for closure including justification of timescales 
Not applicable.

7 For non-closed findings, key milestones and programme 
Not applicable.
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<td>IR-15</td>
<td>Once detailed information becomes available on the performance of concrete, other structures and equipment, the UK nuclear industry should consider any implications for improved understanding of the relevant design and analyses. The industry focus on this recommendation should be on future studies regarding the continuing validation of methodologies for analysing the seismic performance of structures, systems and components important to safety. This should include concrete structures and those fabricated from other materials.</td>
</tr>
</tbody>
</table>

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   Any developments in the industry’s knowledge of the behaviour of construction materials that are relevant to RRDL’s facilities will need to be understood and effectively incorporated into safety justifications and emergency plans. The licensee should review information relating the performance of concrete, other structures and equipment, as it becomes available and consider any implications the design and analyses of existing structures and for the design of new ones. As operations at Rosyth are not wholly dependent upon the strength of concrete structures under fault conditions, applicability may be limited.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   RRDL supports the development of robust and effective safety justification. We anticipate that the goal of this recommendation is to further strengthen safety analyses of relevant facilities in the UK, but is likely to be of limited relevance to Rosyth due to the limited nature of the hazard and the highly robust design and limited life of the facilities.

4. Progress to date
   RRDL is fully engaged with the nuclear industry to support the development of improved processes.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   No.

6. If the finding is not closed, plans for closure including justification of timescales
   This recommendation will remain open while relevant information on structural materials and developments in their analysis evolve.

7. For non-closed findings, key milestones and programme
   Not applicable.
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<tr>
<td>IR-16</td>
<td>When considering the recommendations in this report the UK nuclear industry should consider them in the light of all extreme hazards, particularly for plant layout and design of safety-related plant.</td>
</tr>
</tbody>
</table>

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   As a general requirement, the recommendation is relevant and commensurate with RRDL’s assessment of its resilience to all extreme events.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   We anticipate that the goal of this recommendation is to further strengthen the resilience of nuclear sites in the UK.

4. Progress to date
   Complete.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   Yes. RRDL’s resilience assessment considered the implications of all extreme events for plant layout and facility location, as does its response to the Report recommendations.

6. If the finding is not closed, plans for closure including justification of timescales
   Not applicable.

7. For non-closed findings, key milestones and programme
   Not applicable.
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<thead>
<tr>
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<tbody>
<tr>
<td>IR-17</td>
<td>The UK nuclear industry should undertake further work with the National Grid to establish the robustness and potential unavailability of off-site electrical supplies under severe hazard conditions.</td>
</tr>
</tbody>
</table>

1. Does the Submitting Body agree with the finding?  
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance  
   Not applicable. While it is recognised that the severe disruption lasted for several days at Fukushima and this delay in restoring the on-site power supplies was a significant contributor to the event, RRDL is not dependent upon the reliability of the grid to preserve the safety of radioactive materials at Rosyth, or to effect a sufficient response to an emergency.

3. What is the desired functional outcome and what will be achieved by addressing the issue?  
   Not applicable.

4. Progress to date  
   Not applicable.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?  
   Yes, for the reasons given in 2 above.

6. If the finding is not closed, plans for closure including justification of timescales  
   Not applicable.

7. For non-closed findings, key milestones and programme  
   Not applicable.
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<tbody>
<tr>
<td>IR-18</td>
<td>The UK nuclear industry should review any need for the provision of additional, diverse means of providing robust sufficiently long-term independent electrical supplies on sites, reflecting the loss of availability of off-site electrical supplies under severe conditions. This should be considered along with Recommendation IR-8 within the wider context of “on-site resilience”.</td>
</tr>
</tbody>
</table>

1 Does the Submitting Body agree with the finding?

Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance

Not applicable. While it is recognised that the severe disruption lasted for several days at Fukushima and this delay in restoring the on-site power supplies was a significant contributor to the event, RRDL is not dependent upon the reliability of electrical services to preserve the safety of radioactive materials at Rosyth, or to effect a sufficient response to an emergency.

3 What is the desired functional outcome and what will be achieved by addressing the issue?

Not applicable.

4 Progress to date

Not applicable.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?

Yes, for the reasons given in 2 above.

6 If the finding is not closed, plans for closure including justification of timescales

Not applicable.

7 For non-closed findings, key milestones and programme

Not applicable.
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<tbody>
<tr>
<td>IR-19</td>
<td>The UK nuclear industry should review the need for, and if required, the ability to provide longer term coolant supplies to nuclear sites in the UK in the event of a severe off-site disruption, considering whether further on-site supplies or greater off-site capability is needed. This relates to both carbon dioxide and fresh water supplies, and for existing and proposed new plants.</td>
</tr>
</tbody>
</table>

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
Not applicable. RRDL is not dependent upon the reliability of any cooling services to preserve the safety of radioactive materials at Rosyth, or to effect a sufficient response to an emergency.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
Not applicable.

4 Progress to date
Not applicable.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
Yes, for the reasons given in 2 above.

6 If the finding is not closed, plans for closure including justification of timescales
Not applicable.

7 For non-closed findings, key milestones and programme
Not applicable.
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<tbody>
<tr>
<td>IR-20</td>
<td>The UK nuclear industry should review the site contingency plans for pond water make up under severe accident conditions to see whether they can and should be enhanced given the experience at Fukushima.</td>
</tr>
</tbody>
</table>

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
Not applicable. RRDL is not dependent upon the reliability of any cooling services to preserve the safety of radioactive materials at Rosyth, or to effect a sufficient response to an emergency.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
Not applicable.

4 Progress to date
Not applicable.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
Yes, for the reasons given in 2 above.

6 If the finding is not closed, plans for closure including justification of timescales
Not applicable.

7 For non-closed findings, key milestones and programme
Not applicable.
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<tbody>
<tr>
<td>IR-21</td>
<td>The UK nuclear industry should review the ventilation and venting routes for nuclear facilities where significant concentrations of combustible gases may be flowing or accumulating to determine whether more should be done to protect them.</td>
</tr>
</tbody>
</table>

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
Not applicable. The nature of operations at Rosyth is such that radiation levels are insufficient to generate significant quantities of combustible gases under normal or accident conditions. Further, RRDL is neither dependent upon the reliability of fuel services to preserve the safety of radioactive materials at Rosyth, or to effect a sufficient response to an emergency, nor is any radioactive material susceptible to accumulations of combustible gases.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
Not applicable.

4 Progress to date
Not applicable.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
Yes, for the reasons given in 2 above.

6 If the finding is not closed, plans for closure including justification of timescales
Not applicable.

7 For non-closed findings, key milestones and programme
Not applicable.
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<tr>
<td>IR-22</td>
<td>The UK nuclear industry should review the provision on-site of emergency control, instrumentation and communications in light of the circumstances of the Fukushima accident including long timescales, wide spread on and off-site disruption, and the environment on-site associated with a severe accident. In particular, the review should consider that the Fukushima-1 site was equipped with a seismically robust building housing the site emergency response centre which had: adequate provisions to ensure its habitability in the event of a radiological release; and communication facilities with on-site plant control rooms and external agencies, such as TEPCO headquarters in Tokyo.</td>
</tr>
</tbody>
</table>

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
As a general requirement, this recommendation has only limited application to Rosyth as operations on the Nuclear Licensed Site are not dependent upon installed control and instrumentation systems in order to ensure safety under accident conditions, and the scale of hazard on the Nuclear Licensed Site can not give rise to a severe accident. The matter has already been considered in RRDL's assessment of all of the facilities needed for managing and controlling the response to any extreme event at Rosyth. It determined that an adequate response could be mounted in the wake of widespread disruption and loss of on-site facilities using field arrangements and backup equipment and staff that the current arrangements already provide for.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
The issue has already been addressed.

4 Progress to date
Complete.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
Yes, for the reasons given in 2 above.

6 If the finding is not closed, plans for closure including justification of timescales
Not applicable.

7 For non-closed findings, key milestones and programme
Not applicable.
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<tr>
<td>IR-23</td>
<td>The UK nuclear industry, in conjunction with other organisations as necessary, should review the robustness of necessary off-site communications for severe accidents involving widespread disruption. In addition to impacting communications, it is possible that external events could also affect off-site centres used to support at site in an emergency. Alternative locations should be available and they should be capable of being commissioned in an appropriate timescale.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - As the scale of hazard on the Nuclear Licensed Site can not give rise to a severe accident or cause widespread disruption, this recommendation is not applicable. The matter has already been considered in RRDL’s assessment of its resilience to all extreme events. The assessment examined all of the facilities needed for managing and controlling the response to any extreme accident at Rosyth and determined that an adequate response could be mounted in the wake of widespread disruption and loss of on-site facilities using field arrangements and backup equipment and staff that the current arrangements already provide for.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - The issue has already been addressed.

4. **Progress to date**
   - Complete.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - Yes, for the reasons given in 2 above.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - Not applicable.

7. **For non-closed findings, key milestones and programme**
   - Not applicable.
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| IR-24                                   | The UK nuclear industry should review existing severe accident contingency arrangements and training, giving particular consideration to the physical, organisational, behavioural, emotional and cultural aspects for workers having to take actions on-site, especially over long periods. This should take account of the impact of using contractors for some aspects on-site such as maintenance and their possible response. **This is a wide ranging recommendation and there are a number of aspects that need to be included:**
  | a) the reviews need to acknowledge design differences between individual nuclear facilities and consider whether corporate Severe Accident Guidelines need to be customised; |
  | b) adequacy of trained personnel numbers for long-term emergencies, particularly for multi-unit sites, and taking into account the potential impact of infrastructure damage and societal issues on the ability to mobilise large numbers of personnel; |
  | c) the time windows for availability of off-site support may be challenged hence the role of on-site personnel may change, which has implications for procedures and training; |
  | d) the review of Severe Accident Management Guidelines (SAMG) should consider not only critical safety functions prioritisation, but also whether and how SAMGs support any dynamic reprioritisation based on emerging information; |
  | e) consideration should also be given to operator support requirements relating to tactical and strategic decision making; and |
  | f) in addition to the acute phase of a severe accident, consideration also needs to be given to stabilisation, recovery and clean-up, and the personnel involved from the many organisations involved. |

1 | Does the Submitting Body agree with the finding? |
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<td>Yes.</td>
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2 | How does this apply to the Submitting Body? Describe the level of relevance |
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<tr>
<td>The ability of staff to respond to a major incident in a calm and measured way is integral to the successful implementation of an emergency response. The severe accident at Fukushima identified that (a) an event may continue for a prolonged period, and that (b) that people may be required to perform difficult duties against a background of widespread disruption to the site and the people in the surrounding area. A severe accident cannot occur at Rosyth, nor would any accident continue for a prolonged</td>
<td></td>
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</table>
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<th>3</th>
<th>What is the desired functional outcome and what will be achieved by addressing the issue?</th>
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<tr>
<td></td>
<td>The issue has already been addressed.</td>
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<th>4</th>
<th>Progress to date</th>
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<td>Complete.</td>
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<tr>
<th>5</th>
<th>Is the finding considered closed by the Submitting body and if so the justification for closure?</th>
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<tbody>
<tr>
<td></td>
<td>Yes. RRDL’s assessment of its resilience to all extreme events considered the deployment of suitably competent resources to respond to events that may be extreme in nature and duration. Specifically, it considered the provision of suitably competent and equipped resources to cover the situation where an emergency response may have to be maintained for an extended period or in the event that existing trained staff available on site were incapacitated by the extreme event and it determined that existing contingency and extendibility arrangements would be sufficient. While it is recognised that the special circumstances prevailing in the course of an extreme event (on the presumption that the event had not subsided before emergency response commenced) would affect the timescales and efficiency of response activities and may present additional difficulties for the use of equipment and PPE, the limited nature and scale of consequences arising are such that delay could be tolerated and there would be no public safety requirement to put require response teams to work in unacceptable conditions. Furthermore, if the availability of off-site support should be curtailed, RRDL has sufficient reserve to cope within the current range of procedures and training. The existing arrangements provide for stabilisation, recovery and clean-up.</td>
</tr>
</tbody>
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<tr>
<th>6</th>
<th>If the finding is not closed, plans for closure including justification of timescales</th>
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<tbody>
<tr>
<td></td>
<td>Not applicable.</td>
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<tr>
<th>7</th>
<th>For non-closed findings, key milestones and programme</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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</table>
| IR-25                                   | The UK nuclear industry should review, and if necessary extend, analysis of accident sequences for long-term severe accidents. This should identify appropriate repair and recovery strategies to the point at which a stable state is achieved, identifying any enhanced requirements for central stocks of equipment and logistical support. Recommendation IR-25 is linked with Recommendation IR-13. Combining these two recommendations means that we would expect industry to:
  a) identify potential strategies and contingency measures for dealing with situations in which the main lines of defence are lost. Considerations might include, for example, the operator’s capability to undertake repairs and the availability of spares (capability includes the availability of personnel trained in the use of emergency equipment along with necessary supporting resources);
  b) consider the optimum location for emergency equipment, so as to limit the likelihood of it being damaged by any external event or the effects of a severe nuclear accident;
  c) consider the impact of potential initiating events on the utilisation of such equipment;
  d) consider the need for remotely controlled equipment including valves; and
  e) consider in the layout of the site effective segregation and bunding of areas where radioactive liquors from accident management may accumulate.

Regarding other aspects of Recommendation IR-25, the industry needs to:
  f) ensure it has the capability to analyse severe accidents to properly inform and support on-site severe accident management actions and off-site emergency planning. Further research and modelling development may be required;
  g) ensure that sufficient severe accident analysis has been performed for all facilities with the potential for accidents with significant off-site consequences, in order to identify severe accident management and contingency measures. Such measures must be implemented where reasonably practicable and staff trained in their use; and
  h) examine how the continued availability of sufficient on-site personnel can be ensured in severe accident situations, as well as considering how account can be taken of acute and chronic stress at both an individual and team level (this is linked to Recommendation IR-24).

1 Does the Submitting Body agree with the finding?
Yes.
**Progress Update in Response to**

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<th>Security Classification</th>
<th>Submitting body/Licensee</th>
<th>Issue Control</th>
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<tbody>
<tr>
<td></td>
<td>No Marking Required</td>
<td>Rosyth Royal Dockyard Ltd</td>
<td>Issue: 1</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>26th June 2012</td>
</tr>
</tbody>
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**2 How does this apply to the Submitting Body? Describe the level of relevance**

This recommendation is not relevant to Rosyth as the extreme hazardous event cannot give rise to a severe accident, nor a situation that would prevent a stable recovery being achieved in a short period of time.

**3 What is the desired functional outcome and what will be achieved by addressing the issue?**

Not applicable.

**4 Progress to date**

Not applicable.

**5 Is the finding considered closed by the Submitting body and if so the justification for closure?**

Yes.

Potential strategies and contingency measures for dealing with situations in which the main lines of defence are lost have already been considered in RRDL’s assessment of its resilience to all extreme events. The assessment considered all of the facilities needed for managing and controlling the response to any extreme accident and determined that an adequate response could be mounted in the wake of widespread disruption and loss of on-site facilities using field arrangements and backup equipment and staff that the current arrangements already provide for.

The range of possible outcomes from an extreme event were considered and were such that support services, eg equipment repair and maintenance, would not be appropriate as sufficient backup provision of all necessary equipment and resources exists.

The analysis of a postulated event arising from an extreme hazard is straightforward and does not require further research or modelling.

**6 If the finding is not closed, plans for closure including justification of timescales**

Not applicable.

**7 For non-closed findings, key milestones and programme**

Not applicable.
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<tr>
<td>FR-1</td>
<td>All nuclear site licensees should give appropriate and consistent priority to completing Periodic Safety Reviews (PSR) to the required standards and timescales, and to implementing identified reasonably practicable plant improvements.</td>
</tr>
</tbody>
</table>

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
This recommendation applies to RRDL. RRDL has only one significant safety case extant.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
The reinforcement of current practices to align with modern standards and current good practices within the nuclear industry.

4 Progress to date
The relevant safety case for facilities at Rosyth completed PSR in 2011.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
Yes.
The PSR objectively identified all changes, the effects of which may have been to affect the adequacy of the safety case, as a contemporary reflection of the hazards and associated risks of an operation. It used SAPs as a reference benchmark for current standards and acceptance criteria, and addressed:
- the extent to which the nuclear facility conformed to modern standards and good practices;
- the extent to which plant modifications, changes to modes of operation, and the age of the facility may have affected its safety justification and conformance with current safety targets and acceptance criteria;
- the emerging (from site operation experience) awareness of factors affecting safety, operation-specific and plant-specific operating experience, including ageing, incidents and occurrences;
- the extent to which external/environmental circumstances may have affected its safety justification and conformance with current safety targets and acceptance criteria;
- the adequacy of the arrangements in place to maintain safety until the next PSR in 5 years time or a further safety substantiation for change of use, and,
- the need for any further safety improvements to made.

6 If the finding is not closed, plans for closure including justification of timescales
Not applicable.

7 For non-closed findings, key milestones and programme
Not applicable.
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<tr>
<td>FR-02</td>
<td>The UK nuclear industry should ensure that structures, systems and components needed for managing and controlling actions in response to an accident, including plant control rooms, on-site emergency control centres and off-site emergency centres, are adequately protected against hazards that could affect several simultaneously.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - As a general requirement, the recommendation is relevant and commensurate with RRDL's assessment of its resilience to all extreme events. The assessment considered all of the structures, systems and components needed for managing and controlling actions in response to any extreme accident at Rosyth and determined there to be no need for further improvement.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - We anticipate that the goal of this recommendation is to further strengthen the resilience of nuclear sites in the UK.

4. **Progress to date**
   - Complete.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - Yes. RRDL’s resilience assessment considered all extreme events simultaneously affecting all of its facilities and services.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - Not applicable.

7. **For non-closed findings, key milestones and programme**
   - Not applicable.
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<tr>
<td>FR-03</td>
<td>Structures, systems and components needed for managing and controlling actions in response to an accident, including plant control rooms, on-site emergency control centres and off-site emergency centres, should be capable of operating adequately in the conditions, and for the duration, for which they could be needed, including possible severe accident conditions.</td>
</tr>
</tbody>
</table>

### 1 Does the Submitting Body agree with the finding?
Yes.

### 2 How does this apply to the Submitting Body? Describe the level of relevance
As a general requirement, the recommendation is relevant and commensurate with RRDL’s assessment of its resilience to all extreme events. The assessment considered all of the structures, systems and components needed for managing and controlling actions in response to any extreme accident at Rosyth and determined there to be no need for further improvement.

### 3 What is the desired functional outcome and what will be achieved by addressing the issue?
We anticipate that the goal of this recommendation is to further strengthen the resilience of nuclear sites in the UK.

### 4 Progress to date
Complete.

### 5 Is the finding considered closed by the Submitting body and if so the justification for closure?
Yes. RRDL’s resilience assessment considered all extreme events simultaneously affecting all of its facilities and services for the duration of any emergency arising from an extreme event at Rosyth.

### 6 If the finding is not closed, plans for closure including justification of timescales
Not applicable.

### 7 For non-closed findings, key milestones and programme
Not applicable.
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<tr>
<td>FR-04</td>
<td>The nuclear industry should ensure that adequate Level 2 Probabilistic Safety Analyses (PSA) are provided for all nuclear facilities that could have accidents with significant off-site consequences and use the results to inform further consideration of severe accident management measures. The PSAs should consider a full range of external events including &quot;beyond design basis&quot; events and extended mission times.</td>
</tr>
</tbody>
</table>

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
This recommendation is not relevant to RRDL, as operations at Rosyth do not have the potential for a severe accident, nor one with significant off-site consequences.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
Not applicable.

4 Progress to date
Not applicable.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
Not applicable.

6 If the finding is not closed, plans for closure including justification of timescales
Not applicable.

7 For non-closed findings, key milestones and programme
Not applicable.
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<tr>
<td>FR-05</td>
<td>The relevant Government departments in England, Wales and Scotland should examine the adequacy of the existing system of planning controls for commercial and residential developments off the nuclear licensed site.</td>
</tr>
</tbody>
</table>

1 Does the Submitting Body agree with the finding?  
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance  
Not applicable. The nuclear site at Rosyth is not planned to develop new nuclear facilities.

3 What is the desired functional outcome and what will be achieved by addressing the issue?  
Not applicable.

4 Progress to date  
Not applicable.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?  
Not applicable.

6 If the finding is not closed, plans for closure including justification of timescales  
Not applicable.

7 For non-closed findings, key milestones and programme  
Not applicable.
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<tr>
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<tbody>
<tr>
<td>FR-06</td>
<td>The nuclear industry with others should review available techniques for estimating radioactive source terms and undertake research to test the practicability of providing real-time information on the basic characteristics of radioactive releases to the environment to the responsible off-site authorities, taking account of the range of conditions that may exist on and off the site.</td>
</tr>
</tbody>
</table>

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   Not applicable. The nuclear site at Rosyth is not capable of sustaining an accident that has significant environmental impact or significantly affects public safety.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   Not applicable.

4. Progress to date
   Not applicable.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   Not applicable.

6. If the finding is not closed, plans for closure including justification of timescales
   Not applicable.

7. For non-closed findings, key milestones and programme
   Not applicable.
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<tr>
<td>FR-07</td>
<td>The Government should review the adequacy of arrangements for environmental dose measurements and for predicting dispersion and public doses and environmental impacts, and to ensure that adequate up to date information is available to support decisions on emergency countermeasures.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - Not applicable. The nuclear site at Rosyth is not capable of sustaining a severe accident, nor an accident that has significant environmental impact or significantly affects public safety.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - Not applicable.

4. **Progress to date**
   - Not applicable.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - No.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - Not applicable.

7. **For non-closed findings, key milestones and programme**
   - Not applicable.
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<tr>
<td>FR-08</td>
<td>The Government should consider ensuring that the legislation for the new statutory body requires ONR to be open and transparent about its decision-making, so that it may clearly demonstrate to stakeholders its effective independence from bodies or organisations concerned with the promotion or utilisation of nuclear energy.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - Yes.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - This is essentially a matter for Government. The recommendation is supported in principle, and outcomes would be favourably considered by the licensee.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - RRDL supports the principle of open and transparent communications by government, regulatory and public bodies with a view to improving the reputation of the nuclear industry and the trust of the public.

4. **Progress to date**
   - Not applicable.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - No.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - To be determined by Government and ONR.

7. **For non-closed findings, key milestones and programme**
   - To be determined by Government and ONR.
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<tr>
<td>FR-09</td>
<td>The UK Government, nuclear industry &amp; ONR should support international efforts to improve the process of review &amp; implementation of IAEA &amp; other relevant nuclear safety standards &amp; initiatives in the light of the Fukushima-1 (Fukushima Dai-ichi) accident</td>
</tr>
</tbody>
</table>

1. Does the Submitting Body agree with the finding?  
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance  
   This is essentially a matter for Government. Although supported in principle, the recommendation is unlikely to have significant implications for Rosyth. Applicability is low.

3. What is the desired functional outcome and what will be achieved by addressing the issue?  
   RRDL supports the principle of international cooperation to improve nuclear safety standards.

4. Progress to date  
   Not applicable.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?  
   Yes for the reason given in 2.

6. If the finding is not closed, plans for closure including justification of timescales  
   Not applicable.

7. For non-closed findings, key milestones and programme  
   Not applicable.
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<td>FR-10</td>
<td>ONR should expand its oversight of nuclear safety-related research to provide a strategic oversight of its availability in the UK as well as the availability of national expertise, in particular that needed to take forward lessons from Fukushima. Part of this will be to ensure that ONR has access to sufficient relevant expertise to fulfil its duties in relation to a major incident anywhere in the world.</td>
</tr>
</tbody>
</table>

1. Does the Submitting Body agree with the finding?
   Yes.

2. How does this apply to the Submitting Body? Describe the level of relevance
   Not applicable. The nuclear site at Rosyth is not capable of sustaining a severe accident.

3. What is the desired functional outcome and what will be achieved by addressing the issue?
   Not applicable.

4. Progress to date
   Not applicable.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?
   Not applicable

6. If the finding is not closed, plans for closure including justification of timescales
   Not applicable.

7. For non-closed findings, key milestones and programme
   Not applicable.
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<tr>
<td>FR-11</td>
<td>The UK nuclear industry should continue to promote sustained high levels of safety culture amongst all its employees, making use of the National Skills Academy for Nuclear and other schemes that promote &quot;nuclear professionalism&quot;.</td>
</tr>
</tbody>
</table>

1 Does the Submitting Body agree with the finding?
Yes.

2 How does this apply to the Submitting Body? Describe the level of relevance
RRDL has two principal lines of business to which this recommendation applies. The first concerns the disposal of radioactive waste currently stored on site, which is expected to complete in 2014. This activity cannot give rise to a severe accident, and policies, procedures and safety culture are satisfactory for the scope of work and the period of time required. It is likely that contractors will be engaged and they will accord with extant safety policies and practices sustained by the licensee.

The second line of business is the prospective dismantling of decommissioned submarines, which is expected to commence in 2016/17. This activity will not have the potential for a severe accident, but will require a revision of safety practices and the development of safety culture.

3 What is the desired functional outcome and what will be achieved by addressing the issue?
The aim of this work will be to sustain a high level of safety awareness and competence in all employees, including directors, managers, operators and contractors, in order to prescribe and implement best practice and achieve a high degree of safety and environmental protection.

4 Progress to date
Not started.

5 Is the finding considered closed by the Submitting body and if so the justification for closure?
No.

6 If the finding is not closed, plans for closure including justification of timescales
The plan for revising policies and arrangements to ensure high standards of safety will include the following, although the timescales proposed are arbitrary and dependent upon a future decision to carry out submarine dismantling at Rosyth:
Redevelopment of the licensee’s Nuclear Safety Management Manual which defines nuclear safety policy, key organisational structure, operational safety targets and criteria, and signposts safety management procedures - December 2014
Revision of company procedures that define safety management processes and standards - December 2014
Revision of the licensee’s nuclear training standards and competencies, taking into account current applicable best practice in the nuclear industry and NSAN benchmark training standards - December 2013
Redefinition of the organisation structure and resource levels for submarine dismantling operations - June 2015
Recruitment and training of managers and operatives - June 2016

Security Classification | No Marking Required
<table>
<thead>
<tr>
<th>Security Classification</th>
<th>Submitting body/Licensee</th>
<th>Issue Control</th>
</tr>
</thead>
<tbody>
<tr>
<td>No Marking Required</td>
<td>Rosyth Royal Dockyard Ltd</td>
<td>Issue: 1</td>
</tr>
<tr>
<td></td>
<td></td>
<td>26th June 2012</td>
</tr>
</tbody>
</table>

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<th>First operational deployment of new organisation and processes - 2016/17</th>
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</thead>
<tbody>
<tr>
<td>Review of safety standards achieved, safety culture and safety management processes and introduction of improvements for subsequent operations. - on completion.</td>
</tr>
</tbody>
</table>

7 For non-closed findings, key milestones and programme
As defined in 6 above.
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<td>STF-20</td>
<td>Sellafield Ltd, AWE, RRMPOL, BAESM, DRDL, RRDL, Magnox Ltd and NNB GenCo should provide ONR with the decision-making process to be applied to their Considerations along with a report which describes the sentencing of all their Considerations. The report will need to demonstrate to ONR that the conclusions reached are appropriate.</td>
</tr>
</tbody>
</table>

1. **Does the Submitting Body agree with the finding?**
   - No.

2. **How does this apply to the Submitting Body? Describe the level of relevance**
   - This recommendation is not relevant to RRDL, as there were no considerations left unresolved from its assessment of facility resilience to extreme events.

3. **What is the desired functional outcome and what will be achieved by addressing the issue?**
   - Not applicable.

4. **Progress to date**
   - Not applicable.

5. **Is the finding considered closed by the Submitting body and if so the justification for closure?**
   - Yes.
   - ONR has accepted that, due to the low nature of the site, RRDL did not identify any further considerations over and above its existing emergency arrangements, which can be scaled for major events.

6. **If the finding is not closed, plans for closure including justification of timescales**
   - Not applicable.

7. **For non-closed findings, key milestones and programme**
   - Not applicable.
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<tr>
<td>STF-75</td>
<td>All defence licensees (AWE, RRMPOL, BAESM, DRDL and RRDL) should consider the approach taken by several civilian licensees of using beyond design basis containers that contain a range of equipment and materials that could be beneficial when responding to a beyond design basis accident. This finding is of a similar nature to that raised in the ONR NPP Stress Tests National Report (STF-15).</td>
</tr>
</tbody>
</table>

1. Does the Submitting Body agree with the finding?  
   No.

2. How does this apply to the Submitting Body? Describe the level of relevance  
   This recommendation is not relevant to RRDL, as its assessment of facility resilience to extreme events concluded that the radioactive material on site would not present a significant hazard to the public following any extreme event and that current arrangements provided sufficiently for responding to a beyond design basis accident in the event that currently available equipment and facilities were rendered unusable.

3. What is the desired functional outcome and what will be achieved by addressing the issue?  
   Not applicable.

4. Progress to date  
   Not applicable.

5. Is the finding considered closed by the Submitting body and if so the justification for closure?  
   Yes.  
   ONR has accepted that, due to the low nature of the site, existing emergency arrangements can be scaled for major events.

6. If the finding is not closed, plans for closure including justification of timescales  
   Not applicable.

7. For non-closed findings, key milestones and programme  
   Not applicable.