

## Quarterly site report for HM Naval Base Clyde

April to June 2013

### Foreword

This report is issued as part of the Office for Nuclear Regulation's (ONR) commitment to make information about inspection and regulatory activities relating to HM Naval Base Clyde available to the public. Reports are distributed quarterly to members of the Clyde Local Liaison Committee and are also available on the ONR website ([www.hse.gov.uk/nuclear/llic](http://www.hse.gov.uk/nuclear/llic)).

Site inspectors from ONR usually attend the Clyde Local Liaison Committee and will respond to any questions raised there by the members of the group. Any other person wishing to inquire about matters covered by this report should contact ONR.

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## HM Naval Base Clyde Inspections

The majority of sites inspected by ONR are licensed by HSE under the Nuclear Installations Act 1965 (as amended). HM Naval Base Clyde is not a licensed site although it operates under authorisation from the Ministry of Defence (MoD) Defence Nuclear Safety Regulator (DNSR). The site comprises the Faslane and Coulport facilities and is regulated by ONR through other legislation as noted below. This report summarises the inspection and regulatory activities associated with HM Naval Base (HMNB) Clyde which are co-ordinated with inspections by DNSR.

The ONR site inspector visited the Faslane and Coulport sites on the following date during this quarter:-

12 June 2013

### Routine matters

Inspections on site are undertaken as part of monitoring compliance with:

1. The Health and Safety at Work etc Act (HSWA) 1974 and
2. Regulations made under the HSWA for example the Ionising Radiations Regulations 1999 (IRR99), the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPPIR) and the Management of Health and Safety at Work Regulations 1999 (MHSW99).

### Emergency Preparedness

There were no site exercises carried out during the period, however there was an exercise for the Operational Berth at Loch Goil, which makes use of HMNB Clyde staff and facilities.

### Level 3 Regulatory Interface Forum

This was the first level 3 Regulatory Interface Forum (RIF) attended by the current site inspector. The RIF provided an update of the general issues and key activities across the base. ONR welcomed the proposed strengthening of the health physics team and reduction in workload on the emergency response team reported in the meeting. ONR also noted the progress on addressing the actions from the submarine tank event. This event is discussed further in this report, in the section on non-routine matters.

### Environmental authorisations

The Scottish Environment Protection Agency (SEPA) informed ONR of an application to update the letters of agreement for HMNB Clyde and requested comments from ONR as a

statutory consultee. ONR have written to SEPA confirming that they had no comments at this stage.

## **Non-routine matters**

Operators are required to have arrangements to respond to non-routine matters and events. ONR inspectors judge the adequacy of the operator's response including actions taken to implement any necessary improvements.

ONR and DNSR responded formally to an event related to work carried out in a tank on a submarine at Faslane. The event resulted in some workers receiving a low dose of ionising radiation, due to the work being carried out in the tank at the same time as reactor operations. ONR raised a concern due to the failure to adequately control the work and prevent it taking place when the reactor was operational. In ONR's opinion, this resulted in a failure to properly designate the area and to properly assess the risks to workers arising from the operation. This resulted in lack of ability to demonstrate that any doses received by the workers were as low as reasonably practicable. ONR considered the shortcomings against the enforcement management model and concluded that on this occasion a formal letter was a proportionate response.

ONR consulted with DNSR and agreed that a joint formal letter was a proportionate response, taking account of the work the base had undertaken since the event to address the issues. The letter also confirmed ONR's and DNSR's intention to carry out a joint inspection of the arrangements for control of work related to submarines at Faslane.

## **Regulatory activity**

Under health and safety legislation ONR site inspectors, and other HSE inspectors, may issue enforcement (Crown) notices to secure improvements to safety.

No enforcement (Crown) notices were issued during the quarter.

## **News from ONR**

Insight into more of ONR's work as an independent regulator of the nuclear industry can be found in ONR's Quarterly News (<http://www.hse.gov.uk/nuclear/onr-quarterly-report.htm>). The online publication reports on key themes and developments in each of the regulatory programmes of work and provides an update on ongoing changes at ONR as it progresses toward becoming an independent statutory corporation. Regular news and updates are available on the ONR website (<http://www.hse.gov.uk/nuclear/index.htm>), together with information about our people, sites that we regulate and the work that we do, as well as key guidance and resources.