



**Office for Nuclear Regulation (ONR)
Quarterly Site Report for
BAE SYSTEMS Marine Limited
Devonshire Dock Complex**

Report for period 01 October 2014 to 31 December 2014

Foreword

This report is issued as part of ONR's commitment to make information about inspection and regulatory activities relating to the above site available to the public. Reports are distributed quarterly to members of the BAE SYSTEMS Marine Limited Local Liaison Committee (LLC) and are also available on the ONR website (<http://www.onr.org.uk/lc/>).

Site inspectors from ONR usually attend the BAE SYSTEMS Marine Limited LLC meetings and will respond to any questions raised there. Any person wishing to inquire about matters covered by this report should contact ONR.

1 INSPECTIONS

1.1 Dates of inspection

1. The ONR site inspector made inspections on the following dates during the quarter:
21 to 23 and 29 October
4 to 6 and 26 November
16 to 18 December
2. ONR specialist inspectors made inspections on the following dates during the quarter:
17 and 18 December
3. The Head of ONR's Propulsion Sub-Programme visited the site on the following dates during the quarter:
29 October
6 and 26 November
4. The ONR Programme Director for Defence visited the site on the following date during the quarter:
26 November

2 ROUTINE MATTERS

2.1 Inspections

5. Inspections are undertaken as part of the process for monitoring compliance with:
 - the conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
 - the provisions of the Energy Act 2013;
 - the Health and Safety at Work Act 1974 (HSWA74); and
 - regulations made under HSWA74, for example the Ionising Radiations Regulations 1999 (IRR99) and the Management of Health and Safety at Work Regulations 1999 (MHSWR99).
6. In this period, routine inspections the Devonshire Dock Complex covered the following:
 - Incidents on site;
 - Control and supervision;
 - Documents, records, authorities and certificates;
 - Emergency arrangements.
7. The inspections entail monitoring licensee's actions on the site in relation to incidents, operations, maintenance, projects, modifications, safety case changes and any other matters that may affect safety. The licensee is required to make and implement adequate arrangements under the conditions attached to the licence in order to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and their implementation.
Emergency arrangements.
8. An exercise to demonstrate the arrangements for dealing with an emergency on the licensed site was undertaken on 5 November. This exercise was based on a reactor

accident on board a fictional submarine when moored at Wet Dock Quay and included exercising arrangements to recover and treat a number of simulated ship's staff casualties. The exercise adequately demonstrated the licensee's emergency arrangements as required by licence condition 11.

9. In addition, and as a precautionary measure, the licensee is proposing to amend its emergency arrangements to evacuate all non-essential emergency personnel from the site if a 'Reactor Safety Alert' (RSA) occurs during the phase of reactor power range testing (PRT), which is a phase in the boat-build programme when the reactor undergoes further commissioning and critical operations to demonstrate that the reactor functions and responds as intended.
10. It is important to note that an RSA is not a nuclear emergency. The licensee's main reason for proposing revised arrangements is the difficulty the licensee faces, under current arrangements, to shelter and muster a large and increasing number of personnel on site. As a precautionary measure the licensee is proposing to release personnel from site well in advance of a nuclear emergency being declared, however unlikely this may be.
11. An RSA evacuation exercise of all non-essential personnel within the Devonshire Dock Complex was conducted on the 17 December. The licensee has now applied to ONR to approve amendments to the existing emergency plan to incorporate the above aspects.

3 NON-ROUTINE MATTERS

12. Licensees are required to have arrangements to respond to non-routine matters and events. ONR inspectors judge the adequacy of the licensee's response, including actions taken to implement any necessary improvements.
13. There were no such matters or events of significance during the period.

4 REGULATORY ACTIVITY

14. ONR may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, ONR issues regulatory documents, which either permit an activity or require some form of action to be taken; these are usually collectively termed 'Licence Instruments' (LIs), but can take other forms. In addition, inspectors may issue Enforcement Notices to secure improvements to safety.
 - An Improvement Notice (IN) was issued to the licensee on 3 December 2014. The IN was issued as a result of the licensee not being able to demonstrate adequate compliance with licence condition 12 and being unable to demonstrate that only suitably qualified and experienced persons perform any duties which may affect the safety of operations on the site. ONR first highlighted shortfalls of the licensee's arrangements in March 2012 and it was deemed appropriate to allow the licensee time to remedy those shortfalls. ONR informed the licensee that a further compliance inspection would be conducted in September 2014. The IN was issued because the licensee could not demonstrate that improved arrangements had been implemented. The IN requires the licensee to implement adequate arrangements demonstrating that only suitably qualified and experienced persons perform any duties which may affect the safety of operations on the site by 31 December 2015.
 - On 10 December 2014 ONR determined a revised off-site emergency planning area around the Barrow nuclear sites where the local authority, in this case Cumbria County Council, is required to have an emergency plan in place to protect the public in the unlikely event of a radiation emergency. ONR is required to make these decisions

under the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPiR). The off-site emergency planning area has been revised from two overlapping circular 2 km areas centred on the Wet Dock Quay and Ramsden Dock Basin to a combined area largely based on physical and electoral ward boundaries, including part of the conurbation of Barrow, and extended (due to the single point of access being close to the nuclear site) to include the whole of Walney Island. It also includes watercourses in the Walney and Scarth Channels.

On 1 October 2014 variations came into force for both site licenses reflecting the standard amendments made to Licence Conditions 1 and 3 (See Section 5 for details).

Reports detailing regulatory decisions can be found on the ONR website at <http://www.onr.org.uk/pars/>.

5 NEWS FROM ONR

15. Insight into ONR's work as an independent regulator of the nuclear industry can be found in ONR's Quarterly News. The online publication (<http://www.onr.org.uk/onr-quarterly-report.htm>) reports on the key themes and developments in each of ONR's regulatory programmes and provides an update about the ongoing changes at ONR. <http://www.onr.org.uk/index.htm>. For the latest news and updates from ONR visit the website and sign up for our ebulletin (<http://www.onr.org.uk/ebulletin/index.htm>).

Amended licence conditions

16. Amendments have been made to the standard nuclear site licence conditions 1 and 3 as summarised below.
17. Licence Condition 1 (LC1, Interpretation) provides a set of definitions. ONR decided to amend the definition of "radioactive material" and "radioactive waste" to ensure they are consistent with ONR's regulatory requirements. The changes were necessary because other legislation, to which the Licence Conditions were linked, had amended the definitions.
18. Licence Condition 3 (LC3, Control of Property Transactions) requires the licensee to make and implement adequate arrangements to control property transactions on licensed nuclear sites. LC3 was prescriptive and required the licensee to obtain ONR permission ("consent") before it let, conveyed, assigned or transferred any part of the licensed site to a third party. It made no allowance for the nuclear safety significance of transactions. Changes in the nature of the nuclear industry, with an increasing presence of contractors or other third parties on licensed sites, have resulted in growing numbers of LC3 applications, many of which have little or no nuclear safety significance. This has imposed an unintended regulatory burden on licensees and is an inefficient use of ONR's specialist resource and time. The principal change is to require the licensee to make and implement adequate arrangements that control all property transactions affecting the site and include provision for the classification and management of all property transactions according to their safety significance and their impact on the licensee's control of the site.
19. ONR's licence condition handbook has been updated and is available via the ONR website at <http://www.onr.org.uk/silicon.pdf>

6 CONTACTS

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