



Office for Nuclear Regulation (ONR) Quarterly Site Report for Rosyth Royal Dockyard

Report for period 01 January - 31 March 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 for the Local Liaison Committee and are also available on the ONR website (<http://www.onr.org.uk/lc/>).

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

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1 INSPECTIONS

1.1 Dates of inspection

The ONR site inspector made visits to the site on the following dates during the quarter:

14 to 16 January 2014.

14 February 2014.

18 March 2014.

An ONR specialist inspector in Operational Experience Feedback visited the site on the 15 January 2014.

The ONR Superintending Inspector, Delivery Lead for the Nuclear Propulsion Sub-Programme visited the site on the 16 January.

2 ROUTINE MATTERS

2.1 Inspections

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 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).

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.

In this period, routine inspections of RRDL covered the following:

- Incidents on the Site
- Management of Safety

Incidents on the Site.

The incidents on site inspection consisted of a review of the management system for LC7 (Incidents on the Site) and supporting evidence of compliance. The management system for LC 7 did not meet the expectations laid out in ONR guidance. ONR noted that there were very few formal investigations into nuclear incidents, as we would expect given the nature of operations at Rosyth, but that the investigation report examined did not identify all the root causes and that actions placed did not address all the issues identified by the investigation report. ONR noted that this report was from 2011, related to an event that was relatively minor in risk and did not occur on the licensed site. ONR also examined the action tracking system for nuclear incidents and concluded that the action tracking system had not been properly maintained and did not provide robust evidence that actions had been closed out. As part of the inspection ONR sampled the more general event management system run by Babcock and found that it contained many of the requirements of ONR guidance, but is not currently

used for nuclear or radiological events. ONR concluded that the arrangements for LC7 compliance were below standard, but that these could be relatively quickly and easily moved to an adequate rating and the company have committed to making these changes.

Management of Safety

The management of safety inspection consisted of a sampling of conventional safety risk assessments **with the aim of gaining assurance that issues raised by ONR in a previous inspection had been addressed**. ONR identified an issue with accessing the current risk assessment due to a changeover in software that was currently taking place, but concluded that staff controlling work on the nuclear site were aware of the shortfall and would ensure that work was not carried out without an adequate risk assessment. ONR concluded that the risk assessments inspected were adequate.

In general, ONR judged the arrangements made and implemented by the site in response to safety requirements to be adequate in the areas inspected. However, where improvements were considered necessary, the licensee made satisfactory commitments to address the issues, and the site inspector will monitor progress during future visits. Where necessary, ONR will take formal regulatory enforcement action to ensure that appropriate remedial measures are implemented to reasonably practicable timescales.

2.2 Other work

Level 2 Regulatory Interface Forum

The level 2 RIF was attended by the nominated site inspector and the ONR Superintending Inspector, who is the delivery lead for ONR's propulsion sub-programme. ONR considered it a useful meeting, which allowed us to confirm the senior management's understanding of the issues raised during ONR inspections and confirm their commitment to manage the issues raised.

In particular the senior management confirmed that a contract had been awarded to carry out a periodic review of the Active Waste Accumulation Facility; that the LC36 baseline is in the process of being re-written to support the design phase of the Submarine Dismantling Project and that they were looking for support from Devonport to carry out their own compliance inspections at Rosyth.

ONR encouraged the licensee to take a more strategic approach to the issues raised by ONR, with a response that not only addressed the specific actions raised from interventions, but looked to address the root causes that were causing the shortfalls.

Site Updates

Licence Variation Application

As discussed in the last quarterly report the licensee is in the process of applying for a variation to reduce the size of the licensed site. The licence variation request is currently being assessed by ONR. ONR has consulted with SEPA and Scottish Government on the application. The expectation is that ONR will confirm the outcome of the assessment in the next quarter. The ONR instruction that covers the process of varying the licence in this way is available on the HSE website (www.hse.gov.uk/nuclear/operational/assessment/ns-per-in-005.pdf)

Submarine Dismantling Programme (SDP) programme

The SDP work is subject to the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999 (EIADR) and a submission was received from the licensee in January 2014. Public consultation by ONR on the submission is ongoing and will complete on 22nd April 2014.

Resin Disposal

As discussed in the 2013 Quarter 2 LLC report the disposal route that had been identified by the programme for the resin waste is no longer available for direct disposal and some pre-treatment will be required. The MoD at Rosyth had developed a programme to identify a suitable pre-treatment option to allow ultimate disposal of the waste, however there has been a significant delay to the start of the programme due to the MoD procurement process. ONR are disappointed with the delay and have raised the issue with the MoD locally.

3 NON-ROUTINE MATTERS

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.

There were no such matters or events of significance during the period.

4 REGULATORY ACTIVITY

ONR inspectors, specialist inspectors and HSE inspectors 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.

- No LIs or Enforcement Notices were issued during the period.

5 NEWS FROM ONR

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>).

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