



# Office for Nuclear Regulation (ONR) Quarterly Site Report for Devonshire Dock Complex, Barrow

Report for period 01 July - 30 September 2015

## 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 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 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.

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## 1 INSPECTIONS

### 1.1 Dates of inspection

The ONR nominated site nuclear safety inspector made inspections on the following dates during the quarter:

21, 22, 23, 28 July  
25 August  
7, 8, 9, 10 September

An ONR human and organisational capability specialist inspector made inspections on the following dates during the quarter:

8, 9, 10 September Management systems and supply chain interventions

## 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 Energy Act 2013;
- the Health and Safety at Work etc. 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 Licence Conditions (LCs) 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 Devonshire Dock Complex covered the following:

- LC17 management systems;
- LC19 construction or installation of new plant;
- LC20 modification to design of plant under construction;
- LC26 control and supervision of operations;
- Leadership & management for safety supply chain intervention.

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.

#### LC17 Management Systems

ONR undertook a joint inspection with the Defence Nuclear Safety Regulator (DNSR). The arrangements for compliance with LC17 were deemed in May 2014 to be significantly below standard, leading to the licensee initiating an improvement programme and ONR raising a compliance issue to monitor improvements. We concluded from the current inspection that

the licensee's improvement programme should deliver compliance. We further concluded that the programme was challenging and would require commitment from senior management to ensure that it was sufficiently resourced and that organisational obstacles would be overcome. At the time of this inspection, we considered that sufficient progress with implementing the programme had not been made to support a different view to that in May 2014. ONR therefore rated the inspection as significantly below standard.

#### LC19 Construction or Installation of New Plant and LC20 Modification to Design of Plant Under Construction

ONR undertook a joint inspection with DNSR in the context of the Barrow Site Redevelopment Programme. We concluded for both LCs that the main elements for compliance were present, but that the current presentation of the compliance arrangements makes demonstration of compliance difficult. We noted no issues relating to implementation of the arrangements for these LCs. ONR rated the inspection for both LCs as adequate.

#### LC26 Control and Supervision of Operations

ONR undertook a joint inspection with DNSR. The arrangements for compliance with LC26 were deemed in January 2012 to be significantly below standard, leading to the licensee initiating an improvement programme and ONR raising a compliance issue to monitor improvements. We concluded that measures are not yet in place to "ensure that no operations are carried out which may affect safety except under the control and supervision of suitably qualified and experience persons appointed for that purpose by the licensee". However, we examined aspects of control and supervision within the facility and considered these to be adequate. Taking these factors into account ONR rated the inspection as below standard.

#### Leadership & Management for Safety Supply Chain Intervention

ONR undertook a joint inspection with DNSR. This intervention was undertaken to assess the adequacy of the licensee's supply chain management (SCM) arrangements. We concluded that the SCM arrangements were clear and being used by SCM personnel. The licensee was being proactive in monitoring and improving the performance of its SCM arrangements and gave adequate responses to the high level questions asked. ONR rated the inspection as adequate.

## **2.2 Other work**

The licensee's progress with closing out findings following the Fukushima event in March 2011 was reviewed and satisfactory progress is being made.

## **3 NON-ROUTINE MATTERS**

Licencees 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 matters of significance during the period.

## **4 REGULATORY ACTIVITY**

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.

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

## 5 NEWS FROM ONR

### Retirement of the Chief Nuclear Inspector

Dr Andy Hall, the first Chief Nuclear Inspector to hold this statutory office, announced his decision to retire from ONR in November 2015 and until his retirement he is taking a period of compassionate leave for personal reasons. The ONR Board, with the approval of the Secretary of State, has appointed Dr Richard Savage as Acting Chief Nuclear Inspector, pending a process to fill the role on a permanent basis. Richard was previously Head of the Defence Nuclear Safety Regulator before joining ONR in his current role as a Deputy Chief Nuclear Inspector.

### Regulation Matters magazine

Insight into ONR's work as an independent regulator of the nuclear industry can be found in Regulation Matters. This quarterly online publication (<http://www.onr.org.uk/regulation-matters.htm>) reports on the key themes and developments in each of ONR's regulatory programmes and provides an update about the on-going changes at ONR. For the latest news and updates from ONR, you can also visit the website and sign up for our e-bulletin: <http://www.onr.org.uk/index.htm>.

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Published 11/15

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