



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

Report for period 01 April – 30 June 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 Local Liaison Committee and are also available on the ONR website (<http://www.onr.org.uk/llic/>).

Site inspectors from ONR usually attend Local Liaison 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

ONR Site Inspectors made visits to the site on the following dates during the quarter:

10 April 2015
29 April 2015
8 June 2015

The ONR Superintending Inspector for the Defence Propulsion sites visited the site on the following date during the quarter:

10 April 2015

An ONR Specialist Inspector in Fire Safety visited the site on the following date during the quarter:

22 April 2015

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 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 Rosyth Royal Dockyard site covered the following:

- Annual Review of Safety Meeting;
- Management Systems;
- Documents, records, authorities and certificates;
- Operational records;
- Nuclear safety committee;
- Site walk-down

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.

Annual Review of Safety Meeting

The ONR Site Inspector and the ONR Superintending Inspector participated in the Annual Review of Safety meeting. This comprised a walk-down of facilities across the licensed site, and then the formal meeting to discuss the nuclear safety performance of the site over the previous 12 months. The meeting enabled ONR inspectors to feedback the outcome from the plant tour as well as progress in relation to nuclear safety across the site and to underline expectations that improvements observed in organisational capability are maintained in support of the key projects being implemented on the site. Overall, the ONR inspectors present were satisfied that a reasonable review of safety had been carried out by site and consider that the safety performance during the year had improved.

Licence Compliance Inspection – LC6 Documents, records, authorities and certificates

The LC6 inspection confirmed that the fundamental requirements of the Licence Condition were met, with clear identification of individual responsibilities and clear understanding of the records required to be retained. Inspection of the arrangements for current documentation concluded that the documentation is accessible and retrievable, and that storage arrangements are adequate. On inspection of the archive store it was found that the storage facility is secure and fit for purpose but that there is a shortfall in the arrangements for retrievability and indexing of historical records. The arrangements for LC6 were therefore judged to be below standard and a regulatory issue has been raised requiring the licensee to address this shortfall. Progress will be monitored through routine regulatory business.

Licence Compliance Inspection – LC13 Nuclear safety committee

ONR inspected the arrangements made under LC13. The licensee's terms of reference and arrangements for urgent safety proposals have been approved by ONR and meet the requirements of LC13 and match the expectations set out in ONR's Technical Inspection Guidance. ONR judged that the NSC has been properly constituted, is operating in accordance with its terms of reference and is providing challenge and clear advice. The membership of the NSC has recently been reviewed and extended by the licensee in light of forthcoming submarine dismantling operations and ONR concluded that the arrangements for LC17 are adequate.

Licence Compliance Inspection – LC17 Management systems

ONR inspected the arrangements made under LC17. The licensee's arrangements were examined against the expectations in the ONR Technical Inspection Guide and it was concluded that the licensee has effective arrangements under LC17 for management systems which give due regard to safety. ONR concluded that the arrangements for LC17 are adequate.

Licence Compliance Inspection – LC25 Operational records

The ONR inspection of compliance with LC25 confirmed that the licensee has adequate procedures that identify which records are required to be kept and identify which persons are responsible for ensuring the preparation and retention of records. Samples of various types of records were inspected and staff interviewed to confirm that they were aware of their responsibilities. It was concluded that the licensee has effective arrangements under LC25 for the management of operational records.

Site Walk-down

An unplanned compliance inspection of Dock Number 2 was carried out in support of on-going inspection of the adequacy of the licensee arrangements for the submarine dismantling project. A building that was previously used as a submarine refit building is currently being used as an equipment and archive store. Concern was expressed by the ONR Site Inspector at the material condition of the building and an enforcement letter was subsequently issued to the licensee requiring assurance that the use of this redundant building for these purposes had been properly assessed. A formal response has been received from the licensee, providing assurance that the building will be secured in advance of commencement of submarine dismantling and committing to improvements to management arrangements for control of work in this area of site. The ONR Site Inspector will follow up this issue during the next site inspection visit in July 2015.

2.2 Other work

The ONR Site Inspector held a periodic meeting with safety representatives, to support their function of representing employees and receiving information on matters affecting their health, safety and welfare at work.

The previous ONR Site Inspector for Rosyth attended the site Local Liaison Committee.

The ONR Site Inspector attended a number of meetings during the above site visits to monitor progress against issues on the site.

A meeting was held between the ONR Site Inspector and Fife Council Emergency Resilience Officer where it was confirmed that there is no requirement for Fife Council to consider extendibility as there is no requirement for a REPPIR off-site emergency plan at the Rosyth site.

A formal request has been received from the licensee for a variation to the site licence to remove part of the site previously used for submarine refitting. ONR will undertake independent sampling and analysis of the application areas, assessment of the supporting safety submissions and inspection of the areas to confirm 'no danger', as defined in ONR guidance, would arise from the area of site to be removed by variation to the site licence.

In April, an ONR Conventional Fire Safety Inspector undertook an inspection of the Active Waste Accumulation facility. The general fire safety provisions on site and compliance with the requirements of the Fire (Scotland) Act 1995 were judged to be good. Two issues were raised during the inspection related to fire signage and fire stopping where cables pass through fire compartments. The licensee took immediate action to address these issues and the ONR Fire Inspector is content that both issues have been appropriately dealt with.

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.

ONR was promptly informed of two relevant minor events on the licensed site during this period, related to partial failure of the nuclear alarm and broadcast system and incursion of a helicopter into the site no fly zone. Copies of the licensee's investigation reports are currently awaited and will be followed up during future site inspections.

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 such documents were issued during this 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. 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>).

ONR published its [Annual Report and Accounts for 2014/15](#) on 29 June. The report details key developments during our first year as a public corporation including:

- progress against ONR's Annual Plan 2014/15, including the Chief Nuclear Inspector's annual statement on the safety and security performance of the nuclear industry;
- details of management arrangements and how our resources have been utilised;
- a summary of our governance arrangements;
- the financial statements for 2014/15;
- remuneration of non-executive and executive members of the ONR Board; and
- the Certificate of the Comptroller and Auditor General to the Houses of Parliament, containing an unqualified audit opinion.

6 CONTACTS

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