



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

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 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 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:

30 July 2015
18 August 2015
29 - 30 September 2015

ONR Specialist Inspectors in Conventional Health and Safety visited the site on the following date during the quarter:

18 August 2015

ONR Specialist Inspectors in Radiological Protection and Nuclear Liabilities Regulation visited the site on the following dates during the quarter:

29 - 30 September 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:

- Follow up to enforcement letter
- Arrangements for the Accumulation of radioactive waste
- Emergency arrangements
- Conventional Health and Safety

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.

Follow up to Enforcement Letter ROS70373

An enforcement letter was issued to the licensee in June 2015 requiring assurance that the use of a redundant building on Dock Number 2 as an archive and equipment store had been properly assessed. A formal response was received from the licensee within the specified timescales, 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 confirmed by inspection that required improvements had been made, including vacating the building, isolating electrical supplies, improving physical infrastructure and improving signage. Additional infrastructure improvements have also been implemented, including erection of a security fence and fitting of protective netting over the building. Site's management arrangements for control and supervision were inspected and ONR subsequently confirmed with the Site Director and Head of Nuclear Safety, that it was satisfied with the licensee's response. The outcome from the enforcement letter has led ONR to close-out the regulatory issue that had been raised in relation to this matter.

Licence Compliance Inspection – LC11 Emergency arrangements

In this period ONR Inspectors observed the Rosyth Royal Dockyard Limited Licence Condition LC11 "Emergency Arrangements" Demonstration Emergency Exercise "Nightstar" 2015. Whilst the exercise demonstrated adequate arrangements in many areas, the capability in relation to casualty recovery, communications and command and control at the incident scene was not considered by the attending ONR inspectors to be fully demonstrated. Site will undertake a partial re-demonstration of the emergency arrangements in the areas of casualty recovery and procedures and protocols at the incident scene. This re-demonstration will be observed by ONR in early 2016.

Licence Compliance Inspection – LC32 Accumulation of radioactive waste

ONR inspected the arrangements made under LC32. The licensee's arrangements were examined against regulatory defined expectations and it was concluded that the licensee has made and implemented adequate arrangements under LC32 for minimising so far as is reasonably practicable the rate of production and total quantity of waste accumulated on the site and for recording the wastes accumulated.

2.2 Other work

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

In August two ONR conventional (i.e. non-nuclear) Health and Safety Inspectors undertook a familiarisation visit to the site accompanied by the ONR nominated Site Inspector. The purpose of the visit was to gain an appreciation of the main activities undertaken on the site and the key conventional health and safety hazards that are present as a result of those activities. Overall the visit was positive with the licensee being able to demonstrate a proactive approach towards the management of conventional health and safety on the licenced area of the site. Several areas of potential improvement were identified in relation to edge protection and safe access to cranes. The licensee has adopted a sensible and appropriate approach to addressing the identified issues and progress will be monitored through routine regulatory business.

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 events reported to ONR during this period. The ONR site inspector has reviewed the investigation reports into two relevant minor events reported on the licensed site during the previous quarter, related to partial failure of the nuclear alarm and broadcast system and incursion of a helicopter into the site no fly zone. The ONR inspector concluded that adequate investigations have been undertaken and that appropriate actions had been taken to help prevent a recurrence.

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.

- Table 1 details LIs have been issued during the period:

**Table 1
Licence Instruments and Enforcement Notices Issued by ONR during this period**

Date	Type	Ref No	Description
1 July 2015	LI - Approval	LI No 506	Approval of minor changes to Emergency Arrangements made under Condition 11

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

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 leave. 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>.

6 CONTACTS

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