



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

Report for period 01 April - 30 June 2016

## 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/lhc/>).

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

A new nominated site nuclear safety inspector took over responsibility for the Devonshire Dock Complex, Barrow on 1 April. The incoming ONR nominated site nuclear safety inspector made inspections on the following dates during the quarter:

18, 19, 20, 21 April  
3, 4, 5, 6 May  
6, 7, 8, 9 June

An ONR Nuclear Liabilities inspector made inspections on the following dates during the quarter:

7 April: BAESM Periodic Review of Safety (PRS) 2016 - Nuclear Liabilities Level 4 meeting

An ONR human factors inspector made inspections on the following dates during the quarter:

20 May: PRS - Human Factors Discussions

An ONR internal hazards inspector made inspections on the following dates during the quarter:

3 June: Meeting on Internal Hazards aspects of the PRS assessment.

An ONR fault analysis inspector made inspections on the following dates during the quarter:

14 June: Meeting with BAESML on “wet” safety case

An ONR conventional safety inspector made inspections on the following dates during the quarter:

21 and 22 June: Confined space intervention follow-up

ONR’s assessment of the licensee’s decennial PRS continued during the quarter in order to form a view on adequacy of the periodic review in the next quarter.

## 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. The Licensee is assigned a rating in accordance with the newly implemented Red Amber Green rating system which commenced on the 1<sup>st</sup> of April 2016.

In this period, routine inspections of Devonshire Dock Complex covered the following:

- LC4 - Restrictions on nuclear matter on the site;
- LC5 - Consignment of nuclear matter;
- LC15 - Periodic Review;
- LC16 - Site plans, designs and specifications;
- LC22 - Modification or experiment on existing plant;
- LC7 - Incidents on the Site;
- Conventional health and safety.

In general, ONR judged the arrangements made and implemented by the site in response to safety requirements to be below standard in half of the areas inspected. 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.

#### LC4 Restrictions on nuclear matter on the site

The purpose of Licence Condition 4 (LC4) is to ensure BAESML has adequate arrangements in place to control the entry of nuclear matter onto the licensed site and that all nuclear matter on the site is stored in accordance with adequate arrangements made by the licensee for this purpose.

ONR consider that BAESML's arrangements for compliance with LC 4 have been effectively implemented on the Barrow site. The licensee has adequate arrangements in place to control the entry of nuclear matter onto the licensed site and that all nuclear matter on the site is stored in accordance with adequate arrangements made by the licensee for this purpose. Therefore the Licensee was assigned a rating of Green for LC4.

#### LC5 Consignment of nuclear matter

The purpose of Licence Condition 5 (LC5) is to require that BAESML follows certain requirements in regard to consigning nuclear matter from the licensed nuclear site. Firstly, to ensure that the transfer of nuclear matter, other than excepted matter and radioactive waste, to sites in the UK other than relevant sites is carried out only with the consent of ONR. Secondly, that records are kept of all nuclear matter, including excepted matter and radioactive waste, consigned from the site. The records should be kept for a minimum of 30 years except for the case of theft, loss, etc. in which case retention of 50 years is required.

ONR consider that BAESML's arrangements for compliance with LC 5 have been effectively implemented on the Barrow site. The licensee has adequate arrangements in place to control the consignment of nuclear matter onto and off the licensed site and that all records for nuclear matter on the site are in accordance with adequate arrangements made by the licensee for this purpose.

#### LC15 Periodic Review

The purpose of Licence Condition 15 (LC15) is to require a periodic review and re-assessment of the safety case. The inspection focused on the extent to which the nuclear facility and the safety case conform to modern standards and good practices, whether there are any life-limiting phenomena and identified safety improvements to be implemented following the review.

ONR consider that BAESML's arrangements for compliance with LC 15 have not been effectively implemented on the Barrow site. The licensee has adequate arrangements in place to manage the PRS, however an amber was assigned to LC15 as the Licensee is currently

not in compliance with those arrangements and relevant good practice with respect to delivery of improvements.

#### LC16 Site plans, designs and specifications

The purpose of Licence Condition 16 (LC16) is to require information to augment Schedule 1 to the Site Licence, through the provision of a detailed site plan and schedule of all buildings, plant areas and associated operations which might affect safety. The buildings and plant included in the plan and schedule should be identified on the basis of safety significance and should both be subject to procedures ensuring they are kept up to date.

ONR consider that BAESML's arrangements for compliance with LC 16 have been effectively implemented on the Barrow site. The licensee has adequate arrangements in place for the provision of a detailed site plan and schedule of all buildings, plant areas and associated operations which might affect safety.

#### LC22 Modification or experiment on existing plant

The purpose of Licence Condition 22 (LC22) is to ensure that there are arrangements to categorise and control all modifications and experiments on existing plant or processes that have the potential to affect safety directly. The arrangements should cover all stages of the modification or experiment, from its initial proposal through to ensuring, prior to commissioning, that adequate preparations are made for its execution and the update of all relevant documents, including plant drawings and safety documentation, operating rules, operating instructions and the maintenance schedule. The modification or experiment may require personnel to undergo elements of additional training before the commencement of commissioning and operations, and to demonstrate that staff meet the requirement to be Suitably Qualified & Experienced Personnel (SQEP) and/or Duly Authorised Person (DAP) where this is appropriate.

ONR consider that BAESML's arrangements for compliance with LC 22 are below standard. The inspection identified some shortfalls in aspects of the arrangements and BAESML has committed to develop and implement improvements to address these shortfalls.

#### LC7 Incidents on the Site

The purpose of Licence Condition 7 (LC7) is to ensure that incidents on the site are notified, recorded, investigated and reported by the licensee. ONR anticipates that only incidents with the potential to have an adverse effect on safety are notified to ONR.

ONR consider that BAESML's arrangements for compliance with LC 7 as below standard. The inspection identified a number of shortfalls in aspects of the arrangements BAESML have committed to develop and implement improvements to address these shortfalls.

#### Conventional Health and Safety – Confined Space and issues follow up inspection

The purpose of the visit was to follow up on aspects of the confined space intervention work carried out in October 2015, review work at height arrangements in respect of overhead travelling crane access and dockside edge protection, carry out enquiries into a RIDDOR reportable pedestal drill accident and to review the site's Hand Arm Vibration Management (HAV) management system. Overall the inspection identified some areas of good practice, as well as areas for improvement with some priority actions identified that the site has committed to action.

## **2.2 Other work**

#### Meeting With Safety Representatives

The incoming ONR nominated site nuclear safety 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.

### Review ONR Issues With BAESML

ONR reviewed BAESML's progress with issues from the ONR issues database and concluded that adequate progress was being made relating to all but one issue, which related to the BAESML incident systems. ONR considered that progress relating to this issue was not adequate and BAESML agreed to provide a re-baselined improvement programme for discussion with ONR in August.

### Periodic Review of Safety

BAESML submitted its PRS in October 2015. ONR and DNSR specialist inspectors have made progress with their assessment of the submission during the quarter. ONR will decide the outcome from its review of the Site PRS in the summer and write to BAESML in the Autumn.

## **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 notified of one incident during the quarter, where a heater used for testing was left on too long. However, there no risk to nuclear safety due to the status of the build programme in the Devonshire Dock Hall at the time. The incident was reported late to ONR, which has been highlighted to BAESML but was noted as being an isolated instance. The incident will be followed up by ONR during routine interventions once BAESML's own investigations have been completed.

## **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**

### **Chief Nuclear Inspector's annual statement**

ONR published its Annual Report and Accounts 2015/16 on 7 July. As well as reporting on ONR's performance, the report includes the Chief Nuclear Inspector's annual statement, which provides a judgement on the regulatory attention necessary for each licensed site, dependent on the level of hazard and risk posed by the facility. The Annual Report and Accounts can be viewed on the ONR website.

### **New regulatory structure**

ONR has recently reviewed its organisational arrangements to ensure that our regulatory structure is appropriately focused to deliver front-line regulation over the next few years. To maintain effective and proportionate regulation, and to address potential and actual imbalances in the current workloads of the programmes, we have created three nuclear safety programmes, each led by a Deputy Chief Inspector. These programmes are:

- A new reactors programme dealing with design assessment, licensing and construction of civil reactors.
- An operating facilities programme dealing with operating reactors, defence sites and other operating facilities.
- A Sellafield, decommissioning, fuel and waste programme dealing predominantly in decommissioning and waste.

- You can view ONR's [organisational structure](#) and full [regulatory structure](#) on our website.

### **Chief Nuclear Inspector Summary Plan for 2016/17**

The CNI Summary Plan outlines high level regulatory milestones to deliver ONR's Strategic Plan to 2020 and ONR's approach to the delivery of safety and security regulation across the UK's nuclear reactors and facilities. It was published in early July on the ONR website

### **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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