



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

Report for period 1 July – 30 September 2017

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 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 where these reports are presented 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 inspectors made inspections on the following dates during the report period 1 July to 30 September 2017:

- 11-13 July 2017
- 1 August 2017
- 30-31 August 2017
- 6-7 September 2017

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 the 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 Devonshire Dock Complex, Barrow covered the following:

- Emergency arrangements
- Independent nuclear assurance

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.

On 12 July 2017, a joint ONR / Defence Nuclear Safety Regulator (DNSR) team assessed the annual demonstration on-site emergency exercise (INDIGO 17). This exercise was to demonstrate BAE Submarines Limited's (BAESML) emergency preparedness and response arrangements, made under the licence and authorisation conditions. ONR judged overall that BAESML had provided an adequate demonstration of their emergency preparedness.

ONR conducted an inspection on BAESML's independent nuclear assurance capability on 6 and 7 September 2017. The inspection highlighted a significant improvement in this capability over the last 18 months. However, shortfalls with respect to the mandate and understanding of this function within the organisation led ONR to rate it as Amber. ONR is engaging with the licensee to determine the most effective way to address the shortfalls identified.

2.2 Other work

The site inspector held a periodic meeting with safety representatives to support their representation of employees and receiving information on matters affecting health, safety and welfare at work.

ONR inspectors attended meetings on site to discuss the progress of and the possible regulatory engagement for various aspects of the site redevelopment programme.

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.

Matters and events of particular note during the period were:

ONR was promptly informed of an event where a routine software upload to the reactor safety control panel accidentally caused the reactor safety alert siren to sound for approximately ten minutes. As the siren can be heard both on and off-site the licensee took prompt action to notify relevant stake-holders. The licensee is carrying out an investigation to ensure the incident will not be repeated.

ONR was promptly notified of an event that occurred during a planned discharge of aqueous waste from a submarine. Incorrect valve line up resulted in over pressurisation of the discharge line. This resulted in the rupture of a bursting disc in the relief line. This relief line discharges waste to the same tank as the discharge line. Therefore no spillage to the environment occurred and there was no risk to public safety. ONR is satisfied that the licensee has taken appropriate steps to prevent re-occurrence of this event.

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

ONR has appointed Mark Foy as Chief Nuclear Inspector, effective immediately. Mark is ONR's longest-serving senior regulator and was previously Deputy Chief Nuclear Inspector and Director of the Operating Facilities Division. Dr Richard Savage announced he would be stepping down after two years in the role for family reasons.

ONR will soon launch its new newsletter containing the latest news and developments from across the organisation. If you would like to receive this, please subscribe on the ONR website (<http://www.onr.org.uk/ebulletin/index.htm>).

6 CONTACTS

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