



**Office for Nuclear Regulation (ONR)
Quarterly Site Report for
Devonport Royal Dockyard
(Devonport Royal Dockyard Ltd and
HM Naval Base Devonport)**

Report for period 1 April to 30 June 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 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 Devonport Local Liaison Committee 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 inspectors carried out inspections on the following dates during the quarter:

- 24 – 28 April 2017
- 9 May 2017
- 15 – 19 May 2017
- 12 – 16 June 2017
- 20 June 2017
- 28 – 29 June 2017

Some of the inspections were carried out with inspectors from the Ministry of Defence's internal regulatory organisation, the Defence Nuclear Safety Regulator (DNSR) and the Environment Agency (EA).

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 Devonport covered the following:

- examination, maintenance, inspection and testing;
- safety systems, structures and components;
- management of operations including control and supervision;
- staff training, qualifications and experience;
- plant construction and commissioning;
- incidents on the site;
- operating rules and instructions;
- safety management systems;
- modifications to plant, equipment and safety cases;
- radiological protection;
- radioactive waste management;
- organisational changes;
- decommissioning;
- conventional fire safety; and
- industrial safety and meeting safety representatives.

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.

2.1.1 Nuclear Safety Improvement Programme (NSIP)

DRDL has maintained overall progress with NSIP against the commitments for 2017/18, however the pace of delivery remains slower than ONR's expectations. The NSIP comprises several work streams and continues to be closely monitored by the DRDL Board and by ONR.

Licence Condition (LC) sponsors and owners have now been identified by DRDL, with formal letters of appointment prepared. ONR will continue to monitor the progress with NSIP implementation via engagement with the relevant LC sponsors and owners.

ONR has confidence in the developing maturity of the NSIP with reports and metrics now shared with the DRDL board routinely. Continued board commitment is required to ensure successful implementation and organisational change.

2.1.2 Site Development and Future Nuclear Facilities

ONR continues to engage on the project to provide a new defueling capability in the Submarine Refit Complex (SRC) known as 'Future Nuclear Facilities'. Once complete, the facility will enable final defueling of Laid-up Submarines (LUSM).

Interventions associated with the new Reactor Access House (RAH) continue. The engagements provide regulatory oversight through established regulatory hold points and through DRDL's compliance with its arrangements for modification to the design of plant during construction (LC20) and commissioning (LC21).

Ongoing work associated with the RAH include:

- Continuing engagement to address regulatory issues associated with the RAH.
- Monitoring DRDL's learning from Experience (LfE) associated with the RAH inactive commissioning.

2.1.3 Radioactive Waste Management

During the previous period, ONR and EA wrote jointly to DRDL requesting a schedule for rectification of the current issues identified as the Nuclear Utilities Building (NUB) top priorities, a commitment to produce and implement a modern standards safety case for the NUB, and the production of a coherent plan as to how all current and future radioactive waste management requirements will be fulfilled. The regulators also requested that DRDL clarified the position on the future capability of the NUB or alternative waste facilities.

In this period, DRDL provided a response to the letter which ONR and EA have evaluated. The regulators will engage with DRDL during the next quarter to clarify their expectations.

2.1.4 Submarine Refit Complex (SRC)

ONR continues to seek improvements to the SRC plant safety case as a result of previous permissioning activities. ONR's expectation is that this will be achieved as part of a wider safety case improvement and is monitoring progress through the recently re-convened Safety Case Improvements Meeting (SCIM).

DRDL continues to make preparations for the removal of the refuelling crane pedestal. ONR continues its support for the work to progress as soon as reasonably practicable.

2.1.5 9 Dock

DRDL submitted the phase two safety case for refuelling of HMS Vanguard in July 2016. ONR granted permission for this activity in April 2017.

Following a number of events, a safety stand-down of all crane related operations was undertaken by DRDL across the 9 Dock facility. DRDL placed a series of Management Hold Points, requiring phased return to operation of the 9 Dock cranes. Further details in section 3 below.

2.1.6 Conventional Fire safety

An inspection carried out in June found that improvements set out in a letter sent in February 2017 have not been adequately progressed. The inspection also identified a number of other shortfalls across several facilities that require attention.

ONR continues to seek timely implementation of the required improvements and will work with DRDL to ensure the necessary shortfalls are addressed.

2.1.7 Licence Compliance Inspection – LC11 (Emergency Arrangements)

ONR and DNSR had previously judged that overall the Joint DRDL / HMNB (D) Level 2 Emergency Exercise Short Sermon 16 (SS16) carried out in September 2016 had been an adequate demonstration of the joint on-site plan and off-site emergency plan for the Devonport Site. However, although a formal re-demonstration was not required, ONR had requested that we observe a casualty rescue drill before the next joint Level 1 demonstration exercise scheduled for October 2017.

The relatively limited scope and extent of the exercise resulted in 'live' play being limited to the incident area and the SRC Forward Control Point (FCP). A team of ONR inspectors observed the emergency drill, in particular, casualty handing and rescue and team deployment and reception at the FCP.

ONR judged that there was an adequate performance of the FCP and the intervention teams and a significant improvement to casualty rescue and handover which addressed the issue raised during SS16. As is usual with emergency exercises / drills, some learning points were also observed which require consideration by DRDL.

2.1.8 Licence Compliance Inspection – LC23 (Operating Rules)

An inspection was carried out specifically focused on a small sample of Operating Rules (ORs), identified by DRDL's improvement programme in order to provide confidence that the DRDL were progressing towards sustained LC23 compliance. ONR was broadly satisfied that its expectations were met in regard to the ORs inspected.

To date, the improvement programme has only been partially rolled out and a significant number of ORs and associated Identified Operating Instructions (IOIs) still require review. The inspection highlighted a number of further improvements necessary meet ONR expectations for LC23 (see section 3 below).

2.2 Inspections at HM Naval Base Devonport

The majority of sites inspected by ONR are licensed under the Nuclear Installations Act 1965 (as amended). HM Naval Base Devonport is not a licensed site although it operates under Authorisation from the Defence Nuclear Safety Regulator (DNSR). The site is regulated by

ONR through other legislation as noted below. This report summarises the inspection and regulatory activities associated with HM Naval Base Devonport, which are co-ordinated with inspections by DNSR. Inspections are undertaken as part of the process for monitoring compliance with:

- the Health and Safety at Work etc Act (HSWA) 1974; and
- Regulations made under the HSWA (for example the Ionising Radiations Regulations 1999, the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPiR) and the Management of Health and Safety at Work Regulations 1999).

There were no inspections undertaken by ONR during the period.

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 of particular note during the period were:

3.1 Non-compliances with Operating Limits and Conditions

The site licence requires DRDL to identify operating limits and conditions (OLCs) in the interests of managing safety. During 2016, ONR identified an adverse trend from incident notifications made to it by DRDL, where there had been failures to comply with OLCs particularly in relation to the control of dockside cranes. ONR undertook a review and analysis of some of DRDL's own investigation reports and identified some areas where opportunities for improvement still existed.

In order to provide clarification of ONR's expectations and to provide DRDL with more detailed advice on OLCs, ONR convened a workshop with responsible DRDL personnel in December 2016. Since the workshop, ONR has engaged with DRDL culminating in a presentation by the licensee of progress on a specific sub set of eleven permanent and two temporary Identified Operating Instructions via which it will implement the OLCs.

In April 2017, ONR carried out an LC23 compliance inspection to sample the changes to DRDL's arrangements and implementation of the revised OLCs (see section 2 above). ONR were broadly satisfied that its expectations were met in regard to the Operating Rules inspected. ONR will use the evidence obtained during this inspection to inform its judgement as to whether DRDL has responded adequately to ONR concerns.

3.2 Crane Events

DRDL reported a number of crane related events over a five week period resulting in a safety stand-down of all crane operations on the 9 Dock facility. DRDL has initiated internal investigations to identify the apparent and root causes. A series of management hold points have been placed by DRDL requiring a staged return to operation of the 9 Dock cranes. These hold points reflect learning taken from the internal investigations.

ONR has conducted its own follow up inquires against each of the events. The findings of these inquiries are now been taken through the enforcement management model (EMM) as per ONR arrangements. The EMM process will inform what, if any, further regulatory enforcement action is appropriate.

ONR continues to monitor DRDL's progress in delivering against requirements of the management hold points and the staged return to service of the cranes.

3.3 Change in Propulsion Strategy

ONR has re-focused its regulatory strategy for propulsion sites to recognise the on-going performance categorisation of DRDL as requiring 'enhanced regulatory attention'. In reviewing its regulatory strategy, ONR has undertaken a series of internal workshops, and engaged with the senior leadership team of DRDL, with the intention of:

- Understanding the evidence base of DRDL's performance historically and recently, at the root cause level;
- Gaining clarity on the risk presented by the site, the strategic drivers of the submarine availability programme and likely infrastructure funding scenarios, and how this should inform regulatory strategy;
- Proposing a performance goal for DRDL and determining how our regulatory strategy can help DRDL achieve its nuclear safety improvement goals.

The internal workshops have now been completed. The desired outcome is improved and sustained compliance, enabling categorisation of the site as requiring 'routine regulatory attention'.

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.

- The following LIs and Enforcement Notices have been issued during the period:

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

Date	Type	Ref No	Description
21/04/17	Licence Instrument	LI 563	Agreement to implement CR-14964 for the purpose of undertaking Phase 2 Vanguard Class Deep Maintenance Period (Refuel) activities on Vanguard Class submarines in 9 Dock

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

5 NEWS FROM ONR

ONR Chair awarded CBE

- In the Queen's Birthday Honours announced in June, Chair of the Office for Nuclear Regulation, [Nick Baldwin](#), was appointed a Commander of the Order of the British Empire for services to nuclear safety and security in Britain and to the charitable sector.

Regulatory Research Report published

- ONR has published its [annual regulatory research report](#) which describes the [research activities](#) we have conducted in the past year.

- The report includes case studies showing how our research strategy has helped support our regulatory approach, and helps to inform the development of best practice. It can be viewed at www.onr.org.uk/research

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>).

6 CONTACTS

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Published 08/17

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