



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

Report for period 1 October to 31 December 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 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 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 quarter:

- 11 – 13 December

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 covered the following:

- Organisational Capability
- Examination, inspection, maintenance and testing
- Independent Nuclear Assurance (INA)

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.

Licence Compliance Inspection – LC36 Organisational Capability

ONR Inspectors attended site to review the arrangements and records in relation to organisational capability. Based on the evidence sampled during the inspection, the ONR inspectors concluded that Rosyth Royal Dockyard are compliant with the requirements of LC36. A regulatory issue has been raised regarding the production of a plan for the required future organisational capability for future stages for the Submarine Dismantling Project.

Licence Compliance Inspection – LC28 Examination, inspection, maintenance and testing

ONR Inspectors attended site to review the arrangements and records in relation to examination, inspection, maintenance and testing. Based on the evidence sampled during the inspection, the ONR Inspector concluded that Rosyth Royal Dockyard are compliant with the

requirements of LC28. Minor findings will be followed up by the site inspector as part of normal regulatory business.

Independent Nuclear Assurance

ONR Inspectors attended site to review the arrangements and records in relation to the Independent Nuclear Assurance function. The purpose of the Independent Nuclear Assurance function is to provide the Company Board with assurance and advice that nuclear safety is being given an appropriate level of priority. ONR judged that Rosyth Royal Dockyard Ltd should clearly define and implement appropriate assurance arrangements. This will clarify accountabilities in support of INA activities and improve the effectiveness of the Independent Nuclear Assurance function in providing assurance and advice to the RRDL management board. ONR have a regulatory issue to track improvement which will be monitored over the coming year and which will be supported by a follow-up inspection.

2.2 Other work

ONR Inspectors attended a number of other meetings during the above site visits to monitor progress of projects and against various issues on site.

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 such matters or events of significance during the period

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

5.1 New nuclear power station design approved

The UK Advanced Boiling Water Reactor (UK ABWR), designed by Hitachi-GE, is suitable for construction in the UK, the regulators confirmed following completion of an in-depth assessment of the nuclear reactor design. The Office for Nuclear Regulation (ONR), the Environment Agency and Natural Resources Wales, the regulators who undertake the Generic Design Assessment of new reactor designs, are satisfied that this reactor meets regulatory expectations on safety, security and environmental protection at this stage of the regulatory process.

ONR has issued a Design Acceptance Confirmation (DAC) and the environment agencies have issued a Statement of Design Acceptability (SoDA) to Hitachi-GE.

5.2 Step 2 of nuclear reactor assessment

We also announced on 16 November that we are progressing to the next phase of our assessment of General Nuclear System Ltd's UK HPR1000 reactor technology. This means we will now begin the technical assessment phase. Additionally, all members of the public can

give their views and find out more information about the design by going to UKHPR 1000 website at www.ukhpr1000.com

5.3 ONR response to BEIS impact assessment

The Department for Business, Energy and Industrial Strategy (BEIS) has recently published its Impact Assessment of the Nuclear Safeguards' Bill and that makes reference to ONR's regulation. We contacted BEIS to clarify two points within the document as part of our on-going constructive engagement with them to develop a domestic safeguards regime as part of exiting Euratom. The first is that ONR regulates the nuclear industry, it does not provide services to it. Secondly, the Government's policy has developed since the assessment was undertaken and the intention is to put in place a regulatory framework which is robust and as comprehensive as Euratom. This means that we are not in a position to identify potential efficiencies in our regulatory approach at this stage. As we support BEIS in its development of secondary legislation, we will provide advice to the Government to inform the anticipated impact assessment for nuclear safeguards regulation.

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