



# Office for Nuclear Regulation (ONR) Site Report for HM Naval Base Clyde

Report for period 1 July to 30 September 2018

## 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 Clyde Local Liaison Committee and are also available on the ONR website (<http://www.onr.org.uk/lc/>).

Site inspectors from ONR usually attend Clyde Local Liaison Committee 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

The majority of sites inspected by ONR are licensed under the Nuclear Installations Act 1965. HM Naval Base Clyde is not a licensed site, although it operates under authorisation from the Ministry of Defence (MOD) Defence Nuclear Safety Regulator (DNSR). The site comprises the Faslane and Coulport facilities and is regulated by ONR through other legislation as noted below. This report summarises the inspection and regulatory activities associated with HM Naval Base Clyde which are co-ordinated with inspections by DNSR.

### 1.1 Dates of inspection

The Nominated ONR Site Inspector was accompanied by another ONR Site Inspector and an ONR Emergency Preparedness and Response Inspector who visited the site on the following dates during the quarter:

- 29-30 August 2018.

## 2 ROUTINE MATTERS

### 2.1 Inspections

Inspections are undertaken as part of the process for monitoring compliance with the Health and Safety at Work Act 1974 (HSWA74); and regulations made under HSWA74, for example the Ionising Radiations Regulations 2017 (IRR17), the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPIR), and the Management of Health and Safety at Work Regulations 1999 (MHSWR99).

The three-yearly REPPIR Level 2 demonstration emergency exercise denoted “Evening Star 18” was held on 30<sup>th</sup> August 2018. As a Level 2 exercise, the elements of the off-site emergency plan produced by the Local Authority (LA) under REPPIR and regulated by ONR, were tested as well as the on-site elements of the MoD Operator’s plan. The latter is normally demonstrated on an annual basis at either Level 1 or, as applicable in this case, as part of a Level 2 demonstration. For the on-site aspects, ONR supported DNSR, who focused on elements of the assessment under its Authorisation Condition (AC) 11. For the off-site aspects, DNSR supported ONR at the Clyde off-site centre with the focus on the Local Authority’s REPPIR plan. ONR concurred with the DNSR assessment of the exercise being an adequate demonstration against the requirements of Authorisation Condition 11 and ONR has written to the Local Authority to confirm that the exercise constituted a test of the plan prepared under Regulation 9(1) of REPPIR and demonstrated in accordance with Regulation 10(1)(b).

### 2.2 Other work

An ONR Principal Site Inspector attended the Annual Review of Safety on the 7th August 2018 and was satisfied with the review.

## 3 NON-ROUTINE MATTERS

Licensees / authorisee’s are required to have arrangements to respond to non-routine matters and events. ONR inspectors judge the adequacy of the licensee’s / authorisee’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. No such documents were issued during the period.

## 5 NEWS FROM ONR

### Stakeholder Engagement

- In August our Chief Nuclear Inspector Mark Foy and Deputy Chief Inspector Mina Golshan, hosted a webinar for stakeholders on the outcomes of the UK report to the Joint Convention. This is a new channel of communication which we have introduced, and further webinars are planned for November and February 2019. If you would like to find out more, please contact the ONR Communications team at [contact@onr.gov.uk](mailto:contact@onr.gov.uk)
- The ONR/NGO engagement forum took place on 11 October in London. This is a forum to discuss strategic, cross-cutting regulatory matters. Site specific matters are normally addressed via Site Stakeholder Groups. We are always keen to engage with a range of stakeholders and groups on nuclear safety and security issues, so if you do represent a nuclear-interest Non-Governmental Organisation, and are not already involved through our forum or via a Site Stakeholder Group, then please get in touch with the ONR Communications team for further details, via [contact@onr.gov.uk](mailto:contact@onr.gov.uk)

### Regulatory News

- On 25 July we announced our decision to prosecute the Atomic Weapons Establishment for offences under Section 2 (1)\* of the Health and Safety at Work etc. Act (1974). This charge related to an electrical incident on 27 June, 2017, which resulted in injury to an AWE employee. The incident was a conventional health and safety matter and there was no radiological risk to workers or the public. At a court hearing on 18 September, AWE pleaded guilty to the charge and sentencing was adjourned until 9 November, 2018.

In a separate case brought by ONR, EDF Energy Nuclear Generation Ltd and Doosan Babcock Ltd pleaded guilty on 10 October, 2018) to offences under the Health & Safety at Work etc. Act 1974, section 3(1) and the Work at Height Regulations 2005, Regulation 4(1) respectively. The charges relate to an incident on 12 April 2017 at the Hinkley Point B nuclear power station, which resulted in a serious injury to a Doosan Babcock Ltd employee. Following a hearing at Taunton Magistrates Court, the case was committed for sentencing at Taunton Crown Court with an initial hearing date set for 16 November 2018, although this date is subject to change.

Both of these cases related to conventional, industrial-type incidents that would have been subject to regulation by the Health and Safety executive prior to ONR's creation four years ago, when we gained responsibility for such matters on licensed sites. There was no radiological risk to workers or the public.

Updates on each case will be published on our website [www.onr.org.uk](http://www.onr.org.uk)

- We have recently published our [Statement of civil incidents](#) meeting the Ministerial Reportable Criteria (MRC) reported to ONR - Q2 2018 (1 April 2018 to 30 June 2018). Full details are available on our [website](#).

## **Corporate News**

- In July we published our second [gender pay report](#). The organisation-wide results show that ONR has a mean gender pay gap of 35.2%, which is wider than last year, although it is broadly similar to the rest of the UK nuclear industry and anticipated given our workforce profile, and that of the industries from which we have historically recruited. ONR is committed to addressing this issue and continues to focus on improving diversity and inclusion.
- Our Chief Executive, Adrienne Kelbie, has agreed a three-year contract extension, taking her term of employment to January 2022.
- The Department for Work and Pensions has started the process for recruiting a new ONR Chair (further details can be found on the [public appointments website](#)). Our current Chair, Nick Baldwin CBE, will remain in office until 31 March, 2019.

## **6 CONTACTS**

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