



**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 January to 31 March 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 Devonport 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 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 site inspectors made inspections on the following dates during the quarter:

- 15 – 18 January
- 7 – 8 February
- 12 – 15 February
- 12 – 15 March
- 21 – 22 March

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

## 2 ROUTINE MATTERS

### 2.1 Inspections

Inspections are undertaken as part of the process for checking compliance with:

- the conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
- the provisions of 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. Inspectors 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 documentation;
- safety systems, structures and components;
- management of operations including control and supervision;
- staff training, qualifications and experience;
- emergency preparedness;
- operating rules and instructions;
- safety management systems, 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. Where improvements were considered necessary, the licensee made commitments to address the issues, and the inspectors will monitor progress during future visits. If necessary, ONR will take formal regulatory enforcement action to ensure that appropriate remedial measures are implemented to reasonably practicable timescales.

The following sections provide an update on items previously covered in ONR's site reports, and relevant new information.

## **SITE DEVELOPMENTS 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'. This will enable final defueling of Laid-Up Submarines (LUSM).

ONR is regulating the new Reactor Access House (RAH) project through agreed regulatory hold points and through DRDL's compliance with its arrangements for modification to the design of plant during construction (LC20) and commissioning (LC21).

ONR continues to engage with DRDL on 'Future Docking Facilities'. This work is focused on ensuring that the dockyard has sufficient capacity and facilities to deliver the longer term submarine programme safely. Work is being undertaken on developing an integrated facility/plant safety case, which aims to maximise the safety credit from the boat safety systems, to optimise the infrastructure upgrade requirements.

## **SUBMARINE REFIT COMPLEX**

DRDL has commenced work to remove the legacy crane pedestal in the SRC. ONR has witnessed concrete being removed from the pedestal and DRDL has indicated the work is planned for completion before the end of the current 15 dock outage. The removal of the pedestal is a significant piece of hazard and risk reduction work.

During the 15 dock outage DRDL has made further improvements to the safety systems on the dockside cranes. The improvements were identified by the recently introduced modern standards safety case and ONR will monitor their implementation.

DRDL reported an incident where maintenance was incorrectly carried out on safety related bolts on the dockside cranes. DRDL is currently developing a solution to resolve the deficiency and this will be considered by ONR. If it is appropriate, ONR will place a hold point requiring ONR agreement to implement.

## **9 DOCK**

Routine regulatory engagements continue with the 9 dock facility in respect to safe operations associated with maintenance of HMS Vanguard.

## **SYSTEM BASED INSPECTION – 60HZ ELECTRICAL SUPPLIES**

ONR carried out a planned system based inspection (SBIs) on the 60 Hz electrical supply system. SBIs are an essential element of ONR's overall intervention on a nuclear licensed site, and are intended to establish that the basic elements of a site/facility safety case (as implemented in safety systems and structures) are fit for purpose and will fulfil their safety functional requirements. From the evidence sampled during the inspection, ONR considers that the 60Hz electrical system adequately meets the claims in the relevant safety cases.

## **LICENCE CONDITION 11 – EMERGENCY ARRANGEMENTS**

ONR conducted an assessment of a scheduled emergency exercise drill. ONR considered that DRDL's aims and objectives for the emergency drill were appropriate and that a suitably challenging scenario had been defined. The ONR assessment team focused on demonstration of the on-site emergency response arrangements, primarily on casualty recovery, technical intervention and procedures and protocols at the incident scene and

Forward Control Point. Taking into account the exercise scenario and all the team's exercise assessments, ONR considered the exercise provided an adequate demonstration of the site's emergency arrangements.

## **LICENCE CONDITION 14 – SAFETY DOCUMENTATION**

The LC14 compliance inspection examined the implementation of the licensee's arrangements for the licence condition, specifically their arrangements for managing safety documentation, including modifications to third-party safety cases and ensuring that requirements of their safety cases are implemented.

ONR inspectors were satisfied that DRDL is appropriately managing their safety documentation, including modifications to third party safety cases, and ensuring that all requirements of their safety cases are captured in working level processes. A regulatory issue has been raised to monitor DRDL's development and implementation of formal processes to support the LC 14 arrangements.

## **INSPECTION OF DRDL'S ARRANGEMENTS FOR WORKING AT HEIGHT**

ONR specialist Conventional Health and Safety inspectors undertook a two-day joint ONR/HSE intervention examining the arrangements Babcock Marine and Technology has in place at its DRDL site to manage working at height activities, both within and outside the licensed site boundary (regulated respectively between ONR and HSE). As working at height interfaces with a variety of other hazards, the inspections also took into account a number of other conventional health and safety topics such as maintenance of equipment, control and supervision of work and management of contractors.

A number of areas of good or best practice were seen during the visit in addition to areas for improvement. The Work at Height Improvement Programme, and the various project strands instigated since the previous intervention have improved the control and management of work at height risks. A new regulatory issue will be raised for DRDL to develop a plan to address the management of work at height for contractors.

## **UNANNOUNCED THEMED INSPECTION ON CONTROL OF WORK ARRANGEMENTS**

ONR inspectors conducted an unannounced themed inspection on control of operations and maintenance, including fitness for work. The inspection identified both areas of good practice and a number of shortfalls against regulatory expectations and Relevant Good Practice. The main shortfalls identified were in relation to control and management of spares for crane maintenance. Two new Regulatory Issues have been raised to ensure that DRDL remedies the shortfalls identified in the inspection, and the regulatory expectations have been formally communicated in an enforcement letter. The delivery of wider improvements to facilitate sustained LC26 and LC28 will continue to be monitored through routine site interventions

## **ENGAGEMENT WITH SAFETY REPRESENTATIVES**

The site inspection team 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.

## **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 the following legislation:

- 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 (REPIR) 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.

#### INCIDENTS ON THE SITE

In accordance with site arrangements and regulatory requirements under Licence Condition 7 (Incidents on the site), DRDL has reported a number of events to ONR in the quarter. ONR inspectors have carried out follow up enquires to gather information, to determine if the licensee's response to these events was adequate and to determine if the incident met ONR's investigation criteria. None of the events reported met the ONR investigation criteria. ONR will monitor the efficiency of DRDL's corrective actions as part of normal regulatory business.

### 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.

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

Date	Type	Ref No	Description

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

### 5 NEWS FROM ONR

In January, ONR received the results of its first external stakeholder survey which was undertaken by YouGov on behalf of ONR. A broad range of stakeholders were invited to participate in an online survey, with 351 responses received. In addition to the online survey, a number of in depth interviews were also completed with stakeholders. While overall the

results demonstrate ONR is seen as a high performing organisation with good levels of stakeholder confidence, there are areas where improvements can be made and we will be working with our divisions on those in the coming months. Further details about the survey results can be found in our March 2018 newsletter which is available on ONR's website.

In February, ONR held its first webinar following the publication of the 'Guide to enabling regulation in practice.' Chief Nuclear Inspector, Mark Foy and Deputy Chief Inspector, Mike Finnerty, were on hand to answer questions about the guide which has been designed to illustrate working examples of enabling regulation in practice. This is a new channel of communication for ONR and we'll be holding further webinars on different topics over the coming months. If you would like to join future webinars then please get in touch with the ONR Communications team via [contact@onr.gov.uk](mailto:contact@onr.gov.uk)

In March, ONR held the first of two meetings this year with representatives from across the NGO community. Held in Birmingham, the meeting was attended by 15 NGO representatives from 11 different organisations. Topics discussed included: Domestic Safeguards pending the withdrawal of the UK from Euratom; Emergency Planning Arrangements; and the ONR Stakeholder Survey results. The next meeting is scheduled to take place in October 2018. We are keen to increase the number of people engaging with ONR on nuclear safety and security issues and would like to invite members of SSGs, and LCCs to join our engagement programme. For more details please get in touch via [contact@onr.gov.uk](mailto:contact@onr.gov.uk)  
ONR has issued a Design Acceptance Confirmation (DAC) and the environment agencies have issued a Statement of Design Acceptability (SoDA) to Hitachi-GE.

## 6 CONTACTS

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