



**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 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 Devonport Local Liaison Committee and are also available on the ONR website (<http://www.onr.org.uk/llic/>).

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:

- 11 July
- 16 - 19 July
- 6 – 9 August
- 16 August
- 21 August
- 6 September
- 10 -13 September
- 20 September
- 25 September

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 with inspectors from the Environment Agency.

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;
- training;
- operating rules and instructions;
- safety mechanisms, devices and circuits;
- management systems;
- radiological protection, 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 a "plant based safety case", which aims to maximise the safety credit from the boat safety systems, to optimise the infrastructure upgrade requirements.

ONR has engaged with the licensee in relation to proposed organisational changes that will be implemented in accordance with the licensee's Licence Condition 36 (organisational capability) arrangements.

DEVONPORT NUCLEAR SAFETY STRATEGY

ONR continues to engage with DRDL on the content and time-scales for delivery of the DRDL ten year nuclear safety strategy. ONR has developed a regulatory strategy which enhances the regulatory presence on the site, and focuses on targeted areas to enable DRDL to move out of 'enhanced regulatory attention' at the earliest opportunity. In August, ONR undertook a Delivery Confidence Assurance Review to gain clarity of DRDL's progress against its own Nuclear Safety Improvement Programme (NSIP) and the individual projects that have been established to support its delivery. This was undertaken by accredited reviewers and concluded with a rating of amber, meaning that delivery is feasible but significant issues exist and management attention is required to ensure that the project remains on track.

SUBMARINE REFIT COMPLEX

ONR has agreed the readiness inspections to be carried out before the next docking and is considering some proposed crane modifications to establish if any further permissioning will be required. The licensee has introduced hold points to ensure these are completed.

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 – NUCLEAR FIRE PROTECTION SYSTEMS

ONR carried out a planned inspection of the nuclear fire safety/protection systems (fire prevention, protection and suppression) on 9 dock; sampling the primary circuit decontamination building and associated systems, and general dockside, to confirm the adequacy of implementation of the licensee's safety case in respect of the identified systems. From the evidence gathered during this inspection the ONR inspection team judged that the

fire detection, protection and suppression systems meet the requirements of the safety case, and their implementation is deemed adequate. A specific issue was identified in relation to arrangements and controls are in place to manage the location and distribution of combustible materials and ignition sources (fixed and transient). The site has responded positively to rectify this shortfall.

LICENCE CONDITION 17 – MANAGEMENT SYSTEMS

ONR conducted a Licence Condition 17 compliance inspection on the implementation of the licensee's arrangements for the licence condition, which included supply chain management system arrangements. The inspection demonstrated that the licensee is actively engaged in enhancing and implementing a number of improvements to their existing management system arrangements. Based on the areas sampled during the inspection, the licensee's supply chain management system arrangements were considered to be adequate.

OPERATIONAL READINESS REVIEW – BATTERY TANK VULCANISATION

An inspection was undertaken to conduct a readiness review of the equipment and procedures required for the steam vulcanisation of the Vanguard battery tank lining. The inspection found that the safety documents relating to the battery tank steam vulcanisation process were adequate and that the Licensee is making adequate arrangements and preparations for the conduct of the battery tank steam vulcanisation process.

IONISING RADIATIONS REGULATIONS 2017 AND LICENCE CONDITION 18 – RADIOLOGICAL PROTECTION

ONR conducted an Ionising Radiations Regulations 2017 (IRR17) compliance inspection for both the licensed and authorised sites and a Licence Condition 18 inspection at the licensed site only. Based on the sampling undertaken during the compliance inspection, it was concluded that in general the duty holder has adequate arrangements in place under IRR17 and Licence Conditions 18, including areas of good practice. A regulatory issue was identified which requires action to be taken by the duty holder in relation to material condition of the Radiochemistry Laboratory.

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 (REPPPIR) and the Management of Health and Safety at Work Regulations 1999).

ONR inspected compliance with Ionising Radiations Regulations 2017 and it was concluded that in general the duty holder has adequate arrangements in place under IRR17 including areas of good practice.

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 have 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. ONR will monitor the efficiency of the DRDL corrective actions as part of normal regulatory business. In September, Devonport Royal Dockyard Limited (DRDL) notified ONR of two separate incidents involving cranes at the site, and that they (the licensee) had voluntarily halted all crane related work on the licensed site. ONR has subsequently determined that both these events meet ONR investigation criteria and has therefore initiated a formal investigation.

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

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

- 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

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

- 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.
- 6 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.

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