



**Office for Nuclear Regulation (ONR)
Site Report for
Rolls-Royce Marine Power Operations Limited
(RRMPOL) Raynesway, Derby
Nuclear Fuel Production Plant (NFPP) and Neptune
Reactor Licensed Sites**

Report for period 1 April to 30 June 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 quarterly to members for the Rolls-Royce Local Liaison Committee and are also available on the ONR website (<http://www.onr.org.uk/llic/>).

Site inspectors from ONR usually attend Rolls-Royce 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

ONR inspectors attended site on the following dates during the quarter:

- 20 April 2018
- 24 April 2018
- 26 April 2018
- 16-17 May 2018
- 12-13 June 2018
- 20 June 2018

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 Rolls-Royce Marine Power Operations Limited (RRMPOL) Raynesway, Derby covered the following:

- Internal Regulation

Internal Regulation

This intervention considered RRMPOL organisational capability and capacity within the Internal Regulation function; its independence to be able to raise issues of concern with senior level staff; the adequacy of advice given and timely response to findings; and to broadly assess the cultural acceptance of challenge within the organisation and the remit/mandate of the function. Based on the inspection findings, ONR considers that the internal advice and challenge function within RRMPOL has a clear mandate from the Company Board and is staffed with respected and competent individuals, which provides an effective challenge and advice capability to the business.

Regulatory meetings

ONR attended a routine level 3 regulatory engagement meeting during this period.

2.2 Other work

Throughout this period there were a number of meetings and telephone / teleconference engagements with site to discuss regulatory engagement regarding facility construction and refurbishment 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. In accordance with site arrangements and regulatory requirements under Licence Condition 7 (Incidents on the site), RRMPO have reported two 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 the RRMPO 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.

During this period, ONR has permissioned (via Licence Instrument 508) the installation of plant and equipment in the new Product Assembly Building which is currently under construction on the Raynesway site. ONR has also completed its assessment of RRMPOs periodic review of safety for the Neptune Nuclear Licenced Site and has written to RRMPO, supporting further operation of the Radioactive Components Facility and the Neptune Radiological Calibration Facility on the site, until the next periodic review of safety to be submitted to ONR in 2027. The Neptune Reactor Facility on the Neptune Nuclear Licenced Site is currently shutdown for refurbishment and its restart will be subject to regulatory approval.

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

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

Date	Type	Ref No	Description
04/05/2018	Licence Instrument	LI 508	Agreement to make amendments to the Product Assembly Building Safety Case under arrangements made under Licence Condition 22(1)

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

- On 09 May, we held our annual Industry Conference, with the theme ‘Public Safety – everyone’s responsibility.’ Delegates from more than 45 different organisations attended, and we were delighted that Richard Harrington, Parliamentary Under Secretary of State, Minister for Business and Industry, was able to join us to deliver a keynote speech. The conference provided us with an opportunity to engage directly with senior representatives from across industry and government on a number of topical and strategic issues affecting the sector.
- As part of our continued stakeholder engagement work, we welcomed finance professionals from a number of nuclear site licensees and dutyholders to seminars in London and Birmingham in June. Led by our Finance Director, Sarah High, we hosted the seminars to provide the industry with a better understanding of our charging methodology, the principles we apply, and how the charging process works. To accompany the seminars we have also published a new booklet – [How we charge for Nuclear Regulation](#) – which is available on our [website](#).
- The next ONR/Non-Governmental Organisation (NGO) engagement forum will take 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 NGO, 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

- A delegation from ONR, led by Chief Nuclear Inspector Mark Foy, supported the UK’s contribution to the 6th Joint Convention review meeting in Vienna. Bringing together 78 countries from around the world, the Joint Convention on the Safety of Spent Fuel Management and the Safety of Radioactive Waste Management is the world’s leading international forum for ensuring society and the environment are protected from hazards arising from spent fuel and radioactive waste. Further details can be found on the [IAEA website](#).
- We have notified Sellafield Ltd of our intention to prosecute the company for offences under Section 2 (1) of the Health and Safety at Work etc. Act (1974). The charge relates to an incident on 5 February, 2017, at a facility which handles special nuclear materials, which resulted in personal contamination to a Sellafield Ltd employee. The decision to prosecute follows an ONR investigation into the incident.
- In May we awarded the contract for delivery of the UK Nuclear Safeguards Information Management and Reporting System (SIMRS) IT system to Axis 12 Ltd. The IT system is necessary for us to establish a domestic safeguards regime after the UK’s withdrawal from the Euratom Treaty. The government has now launched the consultation on Nuclear Safeguards Regulation, further details can be found on our [website](#).

Corporate News

- In May we published a self-assessment exercise to update on how well our activity currently aligns with the Regulators' Code, which came into effect in April 2014 to provide a framework for how regulators should engage with those they regulate. The full report is available on our [website](#).
- In June we published our Annual Report and Accounts highlighting the extent of our regulatory activities. During 17/18, over 1,000 inspections were carried out across 36 licensed sites and transport dutyholders, ensuring the required standards of safety and security were met to protect the public and workers. The full report is available on our [website](#).
- 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. This 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 CONTACTS

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