

## PROJECT ASSESSMENT REPORT

<b>Report Identifier:</b>	ONR-DRDL-PAR-14-015
<b>Revision:</b>	0
<b>Project:</b>	Approval to the alteration or amendment to the terms of reference of the DRDL nuclear safety committee and approval to the alteration or amendment to the arrangements to obtain consideration of, or advice on, urgent safety proposals
<b>Site:</b>	Devonport Royal Dockyard Limited
<b>Title:</b>	Application for Approval of Amended or Altered DRDL Nuclear Safety Committee Terms of Reference and the Arrangements for Considering Urgent Nuclear and Radiological Safety Proposals under Arrangements made under Licence Condition 13(3) and (12)
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## Document Acceptance and Approval for Issue / Publication

Role	Name	Position	Signature	Date
Author	[REDACTED]	HM Inspector		28 March 2014
Reviewer	[REDACTED]	HM Principal Inspector		28 March 2014
Accepted by <sup>1</sup>	[REDACTED]	HM Superintending Inspector		28 March 2014
Approval for publication: <sup>2</sup>	[REDACTED]	HM Superintending Inspector		28 March 2014

## Revision History

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A	21 March 2014	[REDACTED]	[REDACTED]	n/a	1 <sup>st</sup> draft for AUH review.
B	24 March 2014	[REDACTED]	[REDACTED]	n/a	2 <sup>nd</sup> draft incorporating AUH comments.
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<sup>1</sup> Acceptance of the PAR to allow release of LI

<sup>2</sup> Approval is for publication on ONR web-site, after redaction where relevant

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Environment Agency	[REDACTED]
Licensee	[REDACTED] / Director Nuclear, Environmental, Safety & Quality [REDACTED] / Nuclear Compliance Manager [REDACTED] [REDACTED]

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# Office for Nuclear Regulation

An agency of HSE

**Defence Programme**

**Devonport Royal Dockyard Limited**

**Approval to the alteration or amendment to the terms of reference of the DRDL nuclear safety committee and approval to the alteration or amendment to the arrangements to obtain consideration of, or advice on, urgent safety proposals**

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Revision 0  
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### **EXECUTIVE SUMMARY**

The licensee has requested ONR Approval under Licence Condition 13(3) and 13(12) due to an intention to revise its Nuclear Safety Committee Terms of Reference and The Arrangements for Considering Urgent Nuclear and Radiological Safety Proposals.

In line with the ONR HOW2 business management system, this Project Assessment Report (PAR) supports the issue of two Licence Instrument Approvals for the intended revisions. The Nominated ONR Site Inspector and the DNSR Devonport Site Inspector have both provided comment to the licensee during the drafting of the revisions. DRDL has also requested DNSR Approval to the revisions under DNSR Authorisation Condition 13.

I am satisfied that the revised Terms of Reference and The Arrangements for Considering Urgent Nuclear and Radiological Safety Proposals are adequate and satisfy the requirements of LC13.

The Propulsion Sub-Programme Superintending Inspector is invited to accept this PAR and, if acceptable, endorse the issue of LI 554 and LI 555.

The Defence Programme Director is invited to sign LI 554 and LI 555.

**LIST OF ABBREVIATIONS**

AC	Authorisation Condition
CV	Curriculum Vitae
DNSR	Defence Nuclear Safety Regulator
DRDL	Devonport Royal Dockyard Limited
HOW2	(Office for Nuclear Regulation) Business Management System
HSE	The Health and Safety Executive
LC	(Nuclear Site) Licence Condition
LI	Licence Instrument
LMfS	Leadership and Management for Safety
ONR	Office for Nuclear Regulation (an agency of HSE)
OR	Operating Rule
PAR	Project Assessment Report
TIG	(ONR) Technical Inspection Guide
TOR	Terms of Reference
USP	Urgent Safety Proposal

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**1 PERMISSION REQUESTED**

1 The licensee has requested (Ref. 1) ONR Approval under Licence Condition 13(3) and 13(12) due to an intention to revise its Nuclear Safety Committee (NSC) Terms of Reference (TOR) and The Arrangements for Considering Urgent Nuclear and Radiological Safety Proposals (USP) (Ref. 2).

**2 BACKGROUND**

2 The current TOR and USP Arrangements at DRDL were Approved by Licence Instruments (LI) 526 and 527 dated September 2009 under Nuclear Site Licence 50B (Refs. 6 and 7). This freezes these arrangements so that they cannot be altered or amended without ONR's express agreement.

3 As the TOR and USP Arrangements are intended to be revised (Ref. 2), the licensee has submitted the new version of this document with an application for ONR Approval under LC13(3) and LC13(12).

4 This Project Assessment Report (PAR) supports the issue of two Licence Instrument (LI) Approvals (Refs. 4 and 5) for the revised TOR and USP arrangements. This PAR and the LI Approvals have been produced in line with the ONR HOW2 business management system (Ref. 3). The Nominated ONR Site Inspector and the DNSR Devonport Site Inspector have both provided comment to the licensee during the drafting of the revised TOR and USP Arrangements. DRDL has also requested DNSR Approval to the revisions under DNSR Authorisation Condition (AC) 13.

**3 ASSESSMENT AND INSPECTION WORK CARRIED OUT BY ONR IN CONSIDERATION OF THIS REQUEST**

5 The alternations and amendments to TOR and USP Arrangements seek to implement the following:

- a clearer explanation of the NSC function;
- a clearer explanation of NSC TOR;
- to include an NSC member for environmental radiation protection and radioactive waste;
- a clearer explanation of responsibilities of members;
- to clarify the approach to Operating Rule (OR) changes;
- to include the role of the NSC 'Action Grid';
- to clarify the role of the HMNB Devonport Naval Base Commander;
- a clearer explanation of NSC secretariat's duties;
- to improve the links to LC13 requirements;
- to re-order the contents into a 'time-line';
- to update references to AGILITY (the licensee's LC and AC compliance system) documents where available.

6 In proportion to the relatively minor changes to the TOR and USP Arrangements, no specialist ONR assessment has been required but I have considered the changes against requirements of LC13 and against the expectations of the LC13 Technical Inspection Guide (TIG) (Ref. 8). This provides guidance primarily for compliance inspections against



LC13, Section 5 of the guide contains some expectations relevant to the TOR and USP Arrangements. It should be noted that the expectations in the TIG are for general guidance and are stated to be neither exclusive nor exhaustive.

7 I have also considered the comments made by the ONR Leadership and Management for Safety (LMfS) sub-group at its meeting on 15 May 2009 (Ref. 9) in respect of the role and purpose of an NSC.

#### 4 MATTERS ARISING FROM ONR'S WORK

8 The amendments to the TOR and USP Arrangements have been discussed with ONR and DNSR, initially as part of the site inspection interface. Ref. 2 has also been reviewed at the 175<sup>th</sup> DRDL NSC in line with LC13(1)(b) and LC13(12) (Ref. 10).

9 I have considered the guidance in Section 5 of the LC13 TIG on the expectations relevant to the TOR and USP Arrangements. I consider that the intent of the TIG is met by the revised TOR and USP Arrangements with two minor potential exceptions which are discussed below.

##### 4.1 Schedule of Responsibility and Documentation

10 Section 5.2 of Ref. 8 outlines an expectation that the TOR and USP Arrangements will normally contain a schedule listing the documentation required and the responsibility for each LC clause. Ref. 2 does not contain this; however, the appropriate identification of responsibilities and documents is clear within the body of the arrangements. The revised TOR also cross-reference the appropriate LC clauses throughout the document. Therefore, I can see little additional benefit in including an explicit schedule along the lines suggested by Ref. 8. I do not consider that the lack of the said schedule should prevent ONR's Approval to the NSC arrangement amendments.

##### 4.2 Provision of CVs

11 Section 5.5 of Ref. 8 states that the TOR and USP Arrangements should ensure that the ONR is required to be provided with a curriculum vitae (CV) for each NSC member. Whilst I have been informed by the DRDL Site Inspector that this is effectively the case for NSC appointments, Ref. 2 does not state this requirement. It does, however, make use of the LC13(5) requirements for the provision of the name, qualifications, previous experience and current position held. I consider that this would be salient information presented by a CV and therefore that the lack of an explicit requirement for a CV is not relevant.

#### 5 CONCLUSIONS

12 This report presents consideration of the licensee's proposed revisions to the DRDL TOR and USP Arrangements (Ref. 2) which incorporate the NSC TOR and the arrangements in place to manage the consideration of urgent safety proposals.

13 Having reviewed Ref. 2, I am satisfied that the revised TOR and USP Arrangements are adequate and satisfy the requirements of LC13.

#### 6 RECOMMENDATIONS

14 The Propulsion Sub-Programme Superintending Inspector is invited to accept this PAR and, if acceptable, endorse the issue of LI 554 (Ref. 4) and LI 555 (Ref. 5). LI check sheets have been completed in accordance with HOW2 (Refs. 11 and 12).

15 The Defence Programme Director is invited to sign LI 554 (Ref. 4) and LI 555 (Ref. 5).

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## 7 REFERENCES

- 1 *Application for Approval of Amended or Altered DRDL Nuclear Safety Committee Terms of Reference and The Arrangements for Considering Urgent Nuclear and Radiological Safety Proposals under Arrangements made under Licence Condition 13(3) and (12)*. DRDL letter DNSQ-021 23718 R dated 17 March 2014 from [REDACTED] Director Nuclear, Environmental, Safety and Quality to [REDACTED], Deputy Chief Inspector of the ONR Defence Programme. TRIM 2014/119339.
- 2 *Nuclear Safety Committee Terms of Reference and The Arrangements for Considering Urgent Nuclear and Radiological Safety Proposals*. OP17-10-000 Issue 02 dated 17 March 2014. DRDL. TRIM 2014/112129.
- 5 *ONR HOW2 Business Management System. Purpose and Scope of Permissioning*. PI/FWD Issue 3. HSE. August 2011.  
[www.hse.gov.uk/nuclear/operational/assessment/index.htm](http://www.hse.gov.uk/nuclear/operational/assessment/index.htm).
- 3 *LC13(3) Approval to the Alteration or Amendment to the Terms of Reference of a Nuclear Safety Committee*. DRDL Licence Instrument Approval 554. TRIM 2014/119383. Sent under letter from ONR to DNSR with Unique Number 71268 N. 28 March 2014. TRIM 2014/112053.
- 4 *LC13(12) Approval to the Alteration or Amendment to the Arrangements to Obtain Consideration of, or Advice on, Urgent Safety Proposals*. DRDL Licence Instrument Approval 555. TRIM 2014/119388. Sent under letter from ONR to DNSR with Unique Number 71269 N. 28 March 2014. TRIM 2014/112057.
- 6 *LC13(3) Approval to the Alteration or Amendment to Devonport Royal Dockyard Ltd's Nuclear Safety Committee's Terms of Reference*. DRDL Licence Instrument 526. September 2009. TRIM 2009/390038.
- 7 *LC13(12) Approval to the Alteration or Amendment to Devonport Royal Dockyard Ltd's Nuclear Safety Committee's Terms of Reference*. DRDL Licence Instrument 527. September 2009. TRIM 2009/390055.
- 8 *Nuclear Safety Technical Inspection Guide – LC13 Nuclear Safety Committee*. NS-INSP-GD-013 Revision 2. ONR. April 2013.  
[http://www.hse.gov.uk/nuclear/operational/tech\\_insp\\_guides/ns-insp-gd-013.pdf](http://www.hse.gov.uk/nuclear/operational/tech_insp_guides/ns-insp-gd-013.pdf).
- 9 *Notes of Sub-Group Meeting on Expectations of Key Licence Conditions*. Leadership and Management for Safety Practitioner Group. 15 May 2009. TRIM 2009/204710.
- 10 *Minutes of Meeting 175 of the DRDL Nuclear Safety Committee held at Devonport Royal Dockyard on 29 May 2013*. DNSQ-12-13. TRIM 2013/224662.
- 11 *LI 554 check sheet*. 28 March 2014. TRIM 2014/112062.
- 12 *LI 555 check sheet*. 28 March 2014. TRIM 2014/112064.