



Submarine Dismantling Project

The decision on the application to carry out a decommissioning project at Rosyth Royal Dockyard under the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999 (as amended)

Project Assessment Report ONR-ROS-PAR-14-021
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TABLE OF CONTENTS

| | | |
|----------|--|----|
| 1 | TITLE | 6 |
| 2 | PERMISSION REQUESTED | 6 |
| 3 | BACKGROUND | 6 |
| 4 | ASSESSMENT WORK CARRIED OUT BY ONR IN CONSIDERATION OF THIS REQUEST | 5 |
| 5 | CONCLUSIONS | 8 |
| 6 | RECOMMENDATION | 9 |
| <u>7</u> | REFERENCES | 10 |

1 TITLE

1. This document reports on the decision taken by the Office for Nuclear Regulation to grant consent for a decommissioning project at Rosyth Royal Dockyard by the licensee, Rosyth Royal Dockyard Ltd

2 PERMISSION REQUESTED

2. Consent to carry out the initial dismantling of seven nuclear submarines currently at Rosyth Royal Dockyard as prescribed in Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999 (EIADR99), as amended in 2006, hereafter EIADR

3 BACKGROUND

3. The Environmental Impact Assessment Directive 85/337/EEC, (as amended by Council Directive 97/11/EC and Council Directive 2003/35/EC), sets out a framework on the assessment of the effects of certain public and private projects on the environment. Additionally, it sets out a framework on public participation in respect of drawing up certain plans and projects relating to the environment, ensuring that the decision-making process is open and transparent. The Directive is implemented in Great Britain for decommissioning nuclear reactor projects by the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999 (EIADR99), as amended in 2006.
4. EIADR requires the licensee to undertake an environmental impact assessment, prepare an environmental statement (ES) that summarises the environmental effects of the project, and apply to The Office for Nuclear Regulation (ONR) for consent to carry out a decommissioning project.
5. Rosyth Royal Dockyard Limited applied to ONR for consent to carry out the initial dismantling of seven nuclear submarines currently at Rosyth Royal Dockyard and provided an environmental statement in January 2014. ONR undertook a public consultation between January 22nd and April 21st 2014 on the ES. Consultations involved 110 individuals and 16 organisations.
6. The ES submitted by RRDLD covers in detail the first stage of the overall project to dismantle the submarines, known as initial dismantling. This is the removal of all radioactive Low-Level Waste (LLW) and Intermediate-Level Waste (ILW) from the submarines, including the Reactor Pressure Vessel (RPV).
7. All LLW and ILW will be removed from Rosyth Dockyard and taken to an existing LLW repository and a facility for storing ILW that has yet to be named, and is part of a separate ongoing national consultation exercise. The ILW store will be an interim storage and will not be at the Rosyth site as the Ministry of Defence (MoD) ruled it out during optioneering.
8. The constraints of the initial dismantling project are such that LLW will be removed from the submarines first and no ILW will be removed from any of the submarines prior to an interim ILW storage site being identified and submissions of methodology

submitted to and accepted by ONR. All ILW will be appropriately packaged and there will be no long-term storage of ILW at Rosyth Dockyard. There will however, be some work required on each of the ILW packages in preparation for transport and this will be carried out in the AWWF at Rosyth Dockyard, with the condition that no more than the ILW from two submarines is in this scenario at any one time.

9. Once all radioactive waste has been removed from the seven submarines, the boats will be taken by sea to a ship recognised ship breaking facility and finally dismantled according to the appropriate regulations governing such work.

4 ASSESSMENT WORK CARRIED OUT BY ONR IN CONSIDERATION OF THIS REQUEST

10. The full ONR methodology and assessment of the ES is presented in the decision report (2014/386900); a summary is provided here. ONR conducted a 3-month public consultation exercise; consultees included the Scottish Environment Protection Agency, Fife Council, Scottish Natural Heritage, the Scottish Government and 16 other organisations. This was publicised widely in the local press, in libraries local to site and on the ONR website. During this consultation, the impact of the decommissioning project on other European Economic Area States (EEA) was assessed by ONR. A letter from the ONR Chief Inspector was sent to the Secretary of State that provided an initial opinion that the decommissioning project is unlikely to have an adverse effect on other EEA States. At the end of the consultation, nine responses were received from eight organisations and the public.
11. The ES covered a wide range of environmental aspects and for each provided an assessment of the likely environmental impact. I took into consideration the comments received and thoroughly reviewed and reported upon each section contained within the ES to reach my conclusions. The assessment considered all the evidence available, with the focus being to review the impact of the decommissioning project on the local environment, in its widest sense (this included socio-economic and heritage as well as ecology and landscape for example). The mitigation measures to reduce or if possible offset adverse environmental impacts were reviewed and assessed for suitability and expected effectiveness using available guidance (such as the Guidelines for Landscape and Visual Impact Assessment 2013) and experience of similar mitigation measures used in other decommissioning projects. The suitability of these mitigation measures was also reviewed and commented on by expert stakeholders (such as Scottish Environment Protection Agency). Previous EIADR experience gained through site audits, reviewing other submissions and knowledge from formal environmental training (IEMA Associate membership for example) was combined to add additional levels of scrutiny for the ES assessment. This information was gathered, reviewed and assessed to provide a meaningful conclusion.
12. My professional opinion considered that, the ES (including supporting evidence) showed overall, the predicted environmental benefits far outweighed any adverse environmental effects of the project. The environmental statement summarised all the environmental impacts of the decommissioning project in 15 key areas, describing their magnitude in terms of Significant Positive, Minor Positive, Negligible, Minor Negative and Significant Negative impacts. The proposal by Rosyth Royal Dockyard Limited will likely pose minimal risk to the environment
13. Traffic and transport was the only key area where any negative impact was identified. This was the likely small increase in traffic, and was deemed minor negative as it will

likely be negligible when considering other plant traffic generated already by Rosyth Dockyard, and by the proposed Container Port.

14. A medium-term Minor Positive socio-economic impact was identified as the potential for up to 80 people to be employed during the project.
15. Another Minor Positive was identified under the area of Waste Management & Sustainability, in that the project is likely to release valuable quantities of metal for recycling.

5 CONCLUSIONS

16. The environmental statement and evidence provided the information that was required and that Rosyth Royal Dockyard Limited could reasonably compile. The issues of importance in the early parts of the project were dealt with in some detail, whereas issues of relevance to the latter parts of the project were of necessity dealt with in terms of broad outlines, and this is judged reasonable given the duration of the project, and additional factors such as final ILW storage.
17. Consultees raised a number of topics relevant to the decommissioning process but which did not necessarily require detailed consideration under the environmental impact assessment process under EIADR. Consultees also raised a number of topics that I considered had been dealt with reasonably in the environmental statement, for example optioneering and mitigation measures. The mechanism of the Environmental Management Plan, submitted annually as a condition of the consent, will be used to ensure that future surveys, mitigation requirements and revisions (as required by new developments), are reported to the ONR and stakeholders.
18. Continued engagement with regulators and stakeholders is an important part of the decommissioning project at Rosyth Dockyard. As the details of any surrounding developments become available, Rosyth Royal Dockyard Limited will assess any likely cumulative impacts and, in combination with regulators and stakeholders, will agree and implement appropriately any required additional mitigation measures to protect the environmental and socio-economic assets of the Rosyth area. It is recommended that Rosyth Royal Dockyard Limited address any future and ongoing cumulative impacts associated with other major significant infrastructure projects in the area and utilise the annual Environmental Management Plan as a means of reporting on findings.
19. The environmental statement summarised all the environmental impacts of the decommissioning project, describing their magnitude in terms of major, moderate, slight or negligible impacts, and their significance in terms of key significant, significant or not significant. In my view, the environmental statement showed that the predicted environmental benefits overall far outweighed any adverse environmental effects of the project.
20. After reviewing the information and evidence provided as part of Rosyth Royal Dockyard Limited's application for consent, it is recommended that consent to dismantle the seven submarines is granted with relevant conditions attached. These conditions of consent can be found in the decision report and are standard conditions given to all EIADR consents).

6 RECOMMENDATION

21. It is my recommendation that consent to dismantle the seven submarines is granted with relevant conditions attached.

7 REFERENCES

1. *Council Directive 85/337/EEC 'Council Directive 85/337/EEC of 27 June 1985 on the assessment of the effects of certain public and private projects on the environment' Official Journal L175 05/07/1985*
2. *Council Directive 97/11/EC 'Council Directive 97/11/EC of 3 March 1997 amending Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment' Official Journal L73 14/03/1997*
3. *Council Directive 2003/35/EC 'providing for public participation in respect of the drawing up of certain plans and programmes relating to the environment and amending with regard to public participation and access to justice Council Directives 85/337/EEC and 97/11/EC' Official Journal L156 25/06/2003*
4. *Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations 1999 SI 1999/2892 The Stationery Office 1999 ISBN 978 0 11 085395 6*
5. *Nuclear Reactors (Environmental Impact Assessment for Decommissioning) (Amendment) Regulations 2006 SI 2006/657 The Stationery Office 2006 ISBN 978 0 11 074242 7*
6. *Environmental Impact Assessment (Scotland) Regulations 1999 SI 1999/1 as amended by the Environmental Impact Assessment (Scotland) Regulations 2002 SI 2002/324 The Stationery Office 1999 ISBN 978 0 11 059107 0*