



Commodore Ian Shipperley ADC Royal Navy
Naval Base Commander Devonport
Varbel Building, No. 58
Ministry of Defence
HMNB Devonport
Plymouth
PL2 2BG

Mr Craig Lockhart
Managing Director
Devonport Royal Dockyard Ltd
Babcock International Group
Devonport Royal Dockyard
Plymouth
PL1 4SG

[REDACTED]
Operating Facilities Programme
Superintending Nuclear Inspector
Redgrave Court
Merton Road
Bootle
Merseyside L20 7HS

Telephone: [REDACTED]

Email: [REDACTED]

Our Reference:
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Date: 15th November 2016

Dear Commodore Shipperley, and Mr Lockhart,

RADIATION (EMERGENCY PREPAREDNESS AND PUBLIC INFORMATION) REGULATIONS 2001 (REPPIR) – DEVONPORT OFF-SITE EMERGENCY PLANNING AND PRIOR INFORMATION AREAS

As you are aware, ONR has been re-determining the REPPIR off-site emergency planning area⁽¹⁾ and the area within which prior information is to be supplied to members of the public in relation to Her Majesty's Naval Base Devonport (HMNB(D)), its associated submarine berths located in Plymouth Sound and Devonport Royal Dockyard (DRD) as prescribed in REPPIR regulations 9(1) and 16(1) respectively.

Under regulation 5(2), and on behalf of the Ministry of Defence (MOD), Navy Command (NC) has reviewed and assessed the risks from its naval submarine reactor plant and HMNB(D) has reviewed the site specific risks for Devonport. The MOD, through the Defence Nuclear Safety Regulator (DNSR) has made a declaration to ONR that there is "no change" to its previously submitted Report of Assessment (RoA) and risks resulting from activities at HMNB(D) and its associated buoys and anchorages.

Under regulation 5(2), Devonport Royal Dockyard Ltd (DRDL) has similarly conducted a review of its previously submitted RoA for the DRDL licensed site and has also concluded that there are no changes to any material factors that would affect its conclusions. DRDL has made a formal declaration to ONR that the Hazard Identification and Risk Evaluation (HIRE) for the DRDL site remains valid.

Our re-determination is made in accordance with ONR's principles and guidance for determination⁽²⁾ of such areas, and this letter is to inform HMNB(D) and DRDL as duty-holders with responsibility under REPPIR for supplying prior information to members of the public around the Devonport site and Plymouth Sound, of the following:

1. ONR notes that, in accordance with the requirements of regulations 5 and 6, the operators' have reviewed their HIREs for the Devonport site and associated Plymouth Sound berths, and have submitted declarations of no change to the circumstances that might affect their RoAs.
2. ONR has completed its assessment of the operators' submissions and concluded that they satisfy the requirements of regulation 6(4) and Schedule 5, and that an off-site emergency plan continues to be required.



3. In accordance with regulation 16(1), ONR has determined the off-site prior information areas around the Devonport site as coincident, and this is the area contained within the red line marked on Map No. 1 attached to this letter, which may be generally described as:
 - *An area extending between 1.5 and 2.5 km from the centre of the Devonport site 5 basin who's boundary follows, in the main, the inner edges of roads, property boundaries and pathways on land and a radius of 2.0 km from the centre of 5 basin on the water.*
4. In accordance with regulation 16(1), ONR has also determined the off-site prior information areas around the submarine buoys and anchorages located in Plymouth Sound, and these are the areas contained within the red lines marked on Map No. 2 and Map No. 3 attached to this letter, which may be generally described as:
 - *A mostly marine and roughly circular area of radius 1.7 km around Delta and Echo buoys in Plymouth Sound that includes the breakwater and Drake Island and also extends onto land to include parts of Bovisand and Crownhill Bays on the eastern side.*
 - *The combined area based on 1.5 km circular radii around 22 and 23 anchorages in Plymouth Sound and including the Plymouth Sound breakwater and the Plymouth Sound breakwater fort.*
5. The prior information areas reflect the site specific application of ONR's principles and related guidance for determination of REPPiR off-site emergency planning and prior information areas (which are published on ONR's website), and consideration of the existing off-site prior information area to extend it as necessary to further enhance public protection. The areas are now defined by geographical features and the consideration of adjacent vulnerable communities and as a result they are no longer circular areas around each relevant berth. These represent the areas within which additional off-site emergency planning and prior information would be of benefit in protecting the public and restricting exposures so far as is reasonably practicable in the event of a reasonably foreseeable radiation emergency.
6. For your information, we have also written to Plymouth City Council which has, in accordance with regulation 9(8), the duty to review, and revise as necessary, the off-site emergency plan for these areas. A copy of the letter advising them of the re-determination is attached.

Yours sincerely

Superintending Nuclear Inspector (Propulsion Sites)



Referenced Explanatory Notes

- (1) The Devonport site and associated Plymouth Sound berths REPPiR off-site emergency planning areas are the area for which Plymouth City Council as the lead local authority, is required, under REPPiR regulation 9(1), to produce an off-site emergency plan for the protection of persons who are, or potentially may be, located in these areas in the event of a radiation emergency. The plans will include public information and a range of countermeasures and other protection measures relevant and proportionate to the radiological hazards associated with the berthed or anchored nuclear powered submarine at appropriate locations within all or part of these areas. In developing the REPPiR off-site emergency plan, the local authority is required to consult a range of persons including the operators, ONR, the emergency services, the relevant health authority, and such other persons, bodies and authorities and members of the public as it considers appropriate.
- (2) The Devonport site and associated Plymouth Sound berths REPPiR off-site prior information areas are the areas within which the operator is required under REPPiR regulation 16(1) to supply to members of the public as a minimum, in an appropriate manner and without their having to request it, the information specified in Schedule 9. The operator shall also make that information publicly available.
- (3) ONR's revised principles for determination of REPPiR off-site emergency planning areas can be found at: <http://www.onr.org.uk/depz-onr-principles.htm>
- (4) The combined HMNB(D) and DRDL on-site plan and its contribution to the off-site plan (e.g. assistance with urgent countermeasures), and the off-site emergency plan put in place by the local authority, would be complemented by wider food restrictions as determined by the Food Standards Agency in accordance with the Food and Environment Protection Act, 1985.
- (5) The REPPiR off-site emergency planning area referred to in this letter is identified as the 'Detailed Emergency Planning Zone' (DEPZ) in the Council's current Off-site Emergency Plan.



Distribution

Her Majesty's Naval Base

[Redacted]

DRDL

[Redacted]

Navy Command

[Redacted]

Cornwall Council

[Redacted]

Devon County Council

[Redacted]

South Hams District Council

[Redacted]

Defence Nuclear Safety Regulator

[Redacted]

Queens Harbour Master – Port of Plymouth

[Redacted]

Maritime and Coastguard Agency:

[Redacted]

Environment Agency

[Redacted]

Food Standards Agency

[Redacted]

Department for Business, Energy & Industrial Strategy

[Redacted]

ONR

[Redacted]

Attachment to letter DRDL71324, dated 15th November 2016, Map No. 1 Devonport: REPPIR regulations 9(1) and 16(1) off-site emergency planning and off-site prior information areas

The area defined by this map may be generally described as:

- **An area extending between 1.5 and 2.5 km from the centre of Devonport dockyard 5 basin who's boundary follows, in the main, the inner edges of roads, property boundaries and pathways on land and a radius of 2.0 km from the centre of 5 basin on the water.**





Attachment to letter DRDL71324, dated 15th November 2016, Map No. 2 Plymouth Sound: REPIR regulations 9(1) and 16(1) off-site emergency Planning and off-site prior information areas

The area defined by this map may be generally described as:

- ***A mostly marine and roughly circular area of radius 1.7 km around Delta and Echo buoys and anchorages in the Plymouth Sound that includes the breakwater and Drake Island and also extends onto land to include parts of Bovisand and Crownhill Bays on the eastern side.***





Attachment to Letter DRDL71323, dated 15th November 2016, Map No. 3: “Plymouth Sound South” REPIR regulations 9(1) and 16(1) off-site emergency planning and off-site prior information areas

The area defined by this map may be generally described as:

- *The combined area based on 1.5 km circular radii around 22 and 23 anchorages in Plymouth Sound and including the Plymouth Sound breakwater and the Plymouth Sound breakwater fort.*

