

**BAESML Barrow Site Emergency Plan**

**Alteration to the Approved Site Emergency Plan**

Project Assessment Report ONR-OFP-PAR-16-018  
Revision 0  
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## EXECUTIVE SUMMARY

### Alteration of the Approved Site Emergency Plan

#### Permission requested

The Licensee has requested ONR's formal Approval under Licence Condition 11(3) for an alteration to its Site Emergency Plan; the existing plan (BAE Systems Submarines Nuclear Site Emergency Plan, NSRD/GR04-002, eDMS 1586217 Issue 2, 11.07.2011 Rev 3 02.02.2015) is to be replaced with a revised plan (BAE Systems Submarines Nuclear Site Emergency Plan, NSRD/GR04-002, eDMS 1586217 Issue 2, 11.07.2011 Rev 4 16.01.2017).

#### Assessment and inspection work carried out by ONR in consideration of this request

ONR's assessment has been limited to determining the extent of the proposed changes relative to the previous issue and their material significance with regard to the on-site emergency arrangements. ONR judges that the proposed amendments are limited to the removal of the Critical Actions Team and Human Resources Team, which does not affect the principles of operation of the plan.

#### Conclusion

It is concluded that the proposed amendments are minimal in nature and do not require any demonstration prior to implementation.

#### Recommendation

It is recommended that Licence Instrument LI 516 be issued to approve BAE Systems Submarines Nuclear Site Emergency Plan, NSRD/GR04-002, eDMS 1586217 Issue 2, 11.07.2011 Rev 4 16.01.2017 and the withdrawal of Licence Instrument 514 which was granted on the 24 February 2015 by the Office for Nuclear Regulation for the approval of BAE Systems Submarine Nuclear Site Emergency Plan NSRD/GR04-002, Issue 2 11.07.2011 Rev 3 02.02.2015.

## LIST OF ABBREVIATIONS

BAE	British Aerospace
BAESML	British Aerospace Systems Marine Limited
CAT	Critical Actions Team
COMAH	Control of Major Accident Hazards
DNSR	Defence Nuclear Safety Regulator
HID	Hazardous Installations Directorate
HR	Human Resources
HSE	The Health and Safety Executive
ONR	Office for Nuclear Regulation
MOD	Ministry Of Defence
NAHQ	Nuclear Accident Head Quarters

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## **1 PERMISSION REQUESTED**

1. BAE Systems Marine Limited (BAESML) Barrow has requested [1] ONR's 'Approval' under Licence Condition 11(3) for the substitution of the document titled BAE Systems Submarines Nuclear Site Emergency Plan, NSRD/GR04-002, eDMS 1586217 Issue 2, 11.07.2011, Rev 4 16.01.2017 [3] for the document titled BAE Systems Submarines Nuclear Site Emergency Plan, NSRD/GR04-002, eDMS 1586217 Issue 2, 11.07.2011 Rev 3 02.02.2015 [2].

## **2 BACKGROUND**

2. BAESML currently construct, test and commission the Astute Class of nuclear powered submarines under contract from the Ministry of Defence (MOD). These activities take place at the BAE Systems shipyard in Barrow-in-Furness within an area designated as a nuclear licensed / authorised site. Licence Condition 11(1) attached to Nuclear Site Licence No. 42 B requires BAESML to make and implement adequate arrangements for dealing with any accident or emergency arising on the site and their effects. The Office for Nuclear Regulation (ONR) Specifies under Licence Condition 11(2), that BAESML submit the Emergency Plan for Approval and that the plan may not be altered or amended without the ONR's Approval under Licence Condition 11(3). Licence Instrument 514 [10] was issued on the 24 February 2015 approving the document titled BAE Systems Submarines Nuclear Site Emergency Plan, NSRD/GR04-002, Issue 2 11.07.2011 Rev 3 02.02.2015 [2].
3. The scope of this assessment covers the substitution of the document titled BAE Systems Submarines Nuclear Site Emergency Plan, NSRD/GR04-002, eDMS 1586217 Issue 2, 11.07.2011 Rev 4 16.01.2017 [3], for the document titled BAE Systems Submarines Nuclear Site Emergency Plan, NSRD/GR04-002, eDMS 1586217 Issue 2, 11.07.2011 Rev 3 02.02.2015 [2]. An early version, for consideration, of Issue 2, Rev 4 was provided to ONR in July 2016, having been considered by BAESML's Nuclear Safety Committee on 29 March 2016 [4].

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

4. In July 2016, BAESML provided Issue 2 Rev 3 of the BAE Systems Submarines Nuclear Site Emergency Plan, which provided a highlighted change log detailing the changes [2].
5. ONR assessment has been limited to determining the extent of the proposed changes and their material significance with regard to the emergency arrangements.
6. ONR provided comments and requested clarification on the document reference numbers of the plan which were responded to by the Licensee [5] and an updated issue of the proposed plan was provided to ONR. The updated revision 4 was subsequently re-examined by ONR in November 2016 [6]. The changes did not materially change the nuclear emergency site plan; ONR is content with the revised proposal.
7. ONR considers the proposed changes to the plan to be minor, in that they are intended to remove the requirement to stand up the Critical Actions Team (CAT), who are situated close to the Nuclear Accident Head Quarters (NAHQ). The CAT receives updates during the exercise and would provide an input from the perspective of business continuity as part of the recovery from an event. The intent is also to remove the requirement for a Human Resources Team to be present to deal with any personnel welfare issues. The CAT and the HR function has no part in the command and control when the Emergency Plan is enacted and therefore is not integral to the aforementioned Emergency Plan. This will have the effect of reducing the number of

personnel which have to be present within a potentially hazardous area. In addition, the changes improve the clarity and accuracy of the text and reflect changes in terminology and the physical site since the previous revision 3.

8. ONR judges that the proposed amendments do not change the principles of operation of the plan and have no safety significance. The absence of the CAT was agreed prior to emergency exercise INDIGO 16 and was not stood up; therefore the revised BAESML Barrow Nuclear Emergency Site Plan does not require any demonstration prior to implementation. Consequently, I consider that it is appropriate for ONR to approve the amended plan.

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

9. ONR have drafted Licence Instrument 516 for Approval for amendment to the "BAE Systems Submarines Nuclear Site Emergency Plan, NSRD/GR04-002" under LC 11(3).

#### **5 OTHER GOVERNMENT DEPARTMENT LIAISON**

10. ONR has liaised with the Defence Nuclear Safety Regulator (DNSR), the Environment Agency (EA) and the Health & Safety Executive's Hazardous Installations Directorate (HID) in their roles as relevant competent authorities for this approval.
11. The DNSR has confirmed [7] that based on the nature of the changes the DNSR do not wish to review the revisions to the BAESML Barrow Nuclear Emergency Site Plan NSRD/GR04-002, for Issue 2, Rev 4 on this occasion.
12. The EA have confirmed [8] that that based on the nature of the changes the EA do not wish to review the revisions to the BAESML Barrow Nuclear Emergency Site Plan NSRD/GR04-002, for Issue 2, Rev 4 on this occasion.
13. The HSE have confirmed [9] that from the perspective of a COMAH Intervention Manager for the BAE Systems site in Barrow, the HSE will not need to review the revisions to the BAESML Barrow Nuclear Emergency Site Plan NSRD/GR04-002, for Issue 2, Rev 4 as the proposed changes will not affect the implementation of the plan in relation to the COMAH area of the Barrow site.

#### **6 CONCLUSIONS**

14. ONR judge that the proposed amendments to the BAESML Barrow Nuclear Emergency Site Plan are minimal in nature the absence of the CAT was agreed prior to INDIGO 16 and was not stood up therefore the revised BAESML Barrow Nuclear Emergency Site Plan does not require any demonstration prior to implementation and that an appropriate case has been made to amend the BAESML Nuclear Site Emergency Plan.

#### **7 RECOMMENDATIONS**

15. ONR Nominated Site Inspector recommends that the Superintending Inspector:
  - Signs this Project Assessment Report to confirm support for the technical and regulatory arguments that justify issuing of Licence Instrument 516.
  - Signs this Project Assessment Report approving its release for publication, after redaction where relevant.
16. ONR Nominated Site Inspector recommends that an ONR Deputy Chief Nuclear Inspector, who is authorised to act on behalf of ONR, Signs Licence Instrument 516 granting Approval for amendments to the BAE Systems Submarines Nuclear Site Emergency Plan.

## REFERENCES

1. BAESML request for approval of changes to the Nuclear Site Emergency Plan NSRD/GR04-002, dated 13th July 2016 TRIM 2016/406090
2. Extant BAE Systems Submarine Nuclear Site Emergency Plan NSRD/GR04-002, eDMS reference 1586217, Issue 2 11.07.2011 Rev 3 02.02.2015, TRIM 2016/406090
3. Proposed BAE Systems Submarine Nuclear Site Emergency Plan NSRD/GR04-002, eDMS reference 1586217, Issue 2 11.07.2011 Rev 4 16.01.2017, TRIM 2017/20275
4. BAE Systems Maritime – Submarines, Minutes of the 166<sup>th</sup> meeting of the Barrow Nuclear Safety Committee 29<sup>th</sup> March 2016 TRIM 2016/406090
5. BAESML email response to questions on proposed on the Nuclear Emergency Plan issued in July 2016, TRIM 2016/456244
6. Proposed BAE Systems Submarine Nuclear Site Emergency Plan NSRD/GR04-002, Issue 2 11.07.2016 Rev 4, TRIM 2016/456244
7. DNSR email – Correspondence in – BAESML Barrow Emergency Plan – 20 December 2016 – TRIM 2017/13166
8. EA email – Correspondence in – BAESML Barrow Emergency Plan – 20 December 2016 – TRIM 2016/475897
9. HID email - Correspondence in – BAESML Barrow Emergency Plan – 20 December 2016 – TRIM 2017/12119
10. BAESML – Barrow – LI No 514 – Letter No BAE 70057N – Approval of Devonshire Dock Complex Emergency Plan, NSRD/GR04-002 – 26 February 2015 TRIM 2015/141587