



Devonport Royal Dockyard

**Request for Agreement or Acknowledgement under arrangements made under Licence
Condition LC22(1)**

**Request for Acknowledgement to Implement Modification/ Experiment NED-MNC-260-
14980, Justification for the Use of the GMK3050-1 Mobile Crane Whilst Operating at 5
Basin Arm (LLFR Hazard)**

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REPORT

Request for Acknowledgement under arrangements made under Licence Condition LC22(1)

Request for Acknowledgement to Implement Modification / Experiment NED-MNC-260-14980, Justification for the Use of the GMK3050-1 Mobile Crane Whilst Operating at 5 Basin Arm (Low Level Refuelling Facility (LLRF) Hazard).

Permission Requested

Devonport Royal Dockyard Limited (DRDL) has written to the Office for Nuclear Regulation (ONR) to request (Ref. 1) Acknowledgement to Implement Modification / Experiment NED-MNC-260-14980, Justification for the Use of the GMK3050-1 Mobile Crane Whilst Operating at 5 Basin Arm (LLFR Hazard) (Ref. 2).

Under Licence Condition 22(1), the licensee is required to control any modification or experiment carried out on any part of the existing plant or processes which may affect safety.

ONR has decided to acknowledge receipt of a letter from the licensee which relates to Implement Modification/ Experiment NED-MNC-260-14980, Justification for the Use of the GMK3050-1 Mobile Crane Whilst Operating at 5 Basin Arm (LLFR Hazard)

Background

The purpose of this Project Assessment Report is to record the ONR Operating Facilities Propulsion sub-division's decision not to assess the modification/ experiment NED-MNC-260-14980. This decision has been taken based upon a judgement of the safety significance of the licensee's submission and its relative priority compared to other safety significant issues receiving the attention of ONR Operating Facilities Propulsion sub-Division.

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

I have conducted a reviewed of DRDL's submission (Ref. 3). This review has not identified any matters that would preclude ONR from providing Acknowledgement to DRDL's request (Ref. 1).

Matters arising from ONR's work

A requirement for clarification has been identified with regard to the deterministic justification of criticality protection of used fuel in the LLRF following building collapse. This will be progressed with the licensee via regulatory issue RI 5565 prior to used fuel entering the LLRF facility.

DRDL submission (Ref. 2) places nuclear safety engineering expectations on mobile cranes which are impractical to implement and as such has not met ONR's expectations with regard to the application of categorisation and classification of safety measures. This has been captured in Ref. 3 and been recorded in regulatory issue RI 3801 (DRDL's approach to categorisation and classification) and will be progressed with the licensee as part of resolution of this issue.

Neither of these matters is considered to affect the permissioning of the current submission and can be addressed via normal regulatory interactions.

Conclusions

A standard Acknowledgement Licence Instrument (LI) (LI - 564) should be issued to DRDL.

Recommendation

I recommend the issue of LI-564 Acknowledgement to implement modification/experiment NED-MNC-260-14980, justification for the use of the GMK3050-1 mobile crane whilst operating at 5 Basin Arm (LLRF HAZARD) to DRDL.

REFERENCES

1. DRDL Letter ref. no. 2017/265114 under the arrangements made under LC22(1), request for ONR's Acknowledgement to Implement Modification Experiment NED-MNC-260-14980, Justification for the Use of the GMK3050-1 Mobile Crane Whilst Operating at 5 Basin Arm ((LLRF Hazard)
2. CDMS-000119267 - NED-MNC-260-14980, Justification for the Use of the GMK3050-1 Mobile Crane Whilst Operating at 5 Basin Arm (LLFR Hazard) - July 2017 (Trim Ref. 2017/269110).
3. ONR Assessment Note of Devonport Royal Dockyards Ltd. (DRDL) Use of the GMK3050-1 mobile crane whilst operating at 5 Basin arm (LLRF hazard) – July 2017 (Trim Ref. 2017/272718)

LIST of ABBREVIATIONS

DRDL	Devonport Royal Dockyard Limited
LLRF	Low Level Refuelling Facility
LI	Licence Instrument
ONR	Office for Nuclear Regulation