



Captain Paul Jessop
NAVY SM-CSOE
NCHQ, MP2-3
Leach Building
HMS Excellent
Whale Island
Portsmouth
PO2 8ER



Redgrave Court
Merton Road
Bootle
Merseyside L20 7HS

Telephone: [Redacted]
Email: [Redacted]

Our Reference:
TRIM Ref: 2017/22798
Unique Number: MOD70030

Date: 28th February 2017

RADIATION (EMERGENCY PREPAREDNESS AND PUBLIC INFORMATION) REGULATIONS 2001 (REPPIR) – LOCH GOIL OPERATIONAL BERTH EMERGENCY PLANNING AND PRIOR INFORMATION AREAS

Dear Captain Jessop

As you are aware, ONR has been re-determining the REPPIR off-site emergency planning area⁽¹⁾ and the area within which prior information shall be provided to the public⁽²⁾ around the Loch Goil Operational Berth, as prescribed in REPPIR regulations 9(1) and 16(1) respectively.

On behalf of the Ministry of Defence (MOD), Navy Command (NC) has made a declaration to ONR that there is no change to the circumstances that might affect its Report of Assessment (RoA) for the naval submarine reactor plant.

Our re-determination has been made in accordance with ONR's principles and guidance for the determination⁽³⁾ of such areas and this letter is to inform Navy Command, as the MOD duty-holder with responsibility under REPPIR for supplying prior information to members of the public around the Loch Goil Operational Berth, of the following:

1. ONR notes that, in accordance with the requirements of regulations 5 and 6, NC has reviewed its Hazard Identification and Risk Evaluation (HIRE) and Report of Assessment (RoA) for the naval submarine reactor plant, and has submitted to ONR, a declaration of no change of circumstances, as provided for under regulation 5(2).
2. ONR has completed its assessment of the NC submission and has concluded that it satisfies the requirements of regulation 5(2), and that an off-site emergency plan continues to be required.
3. In accordance with regulations 9(1) and 16(1), ONR has re-determined both the off-site emergency planning and prior information areas around the Loch Goil Operational Berth as coincident, and this is the area contained within the red line on the map attached to this letter, which may be generally described as:
 - *A circular area of 1.5 km radius from the Operational Berth over the marine and land environments, and extending to include those properties lying adjacent to the 1.5 km minimum boundary.*



4. The planning area reflects the site specific application of ONR's principles and related guidance for determination of REPPiR off-site emergency planning areas (which are published on the ONR website), and consideration of the existing off-site emergency planning area to extend it beyond the minimum required circular area to further enhance public protection. The area is now defined by geographical features and the consideration of adjacent vulnerable communities. This represents the area within which additional off-site emergency planning 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.
5. In addition to arrangements made under REPPiR, the MOD's DNSR requires under formal Authorisation Conditions (that are closely aligned to ONR Licence Conditions) adequate arrangements for dealing with any accident or emergency arising at the Operational Berth and their effects⁽⁴⁾, these arrangements are implemented by Navy Command on behalf of MOD.
6. For your information, we have also written to Argyll and Bute Council which has the duty to revise its off-site emergency plans for this area, and a copy of the letter advising them of the re-determination is attached.

Yours sincerely,

[Redacted signature block]

Referenced Explanatory Notes:

(1) The Loch Goil Operational Berth REPPiR off-site emergency planning area is the area for which Argyll and Bute 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 this area 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 this area. 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 Loch Goil Operational Berth REPPiR off-site prior information area is the area 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

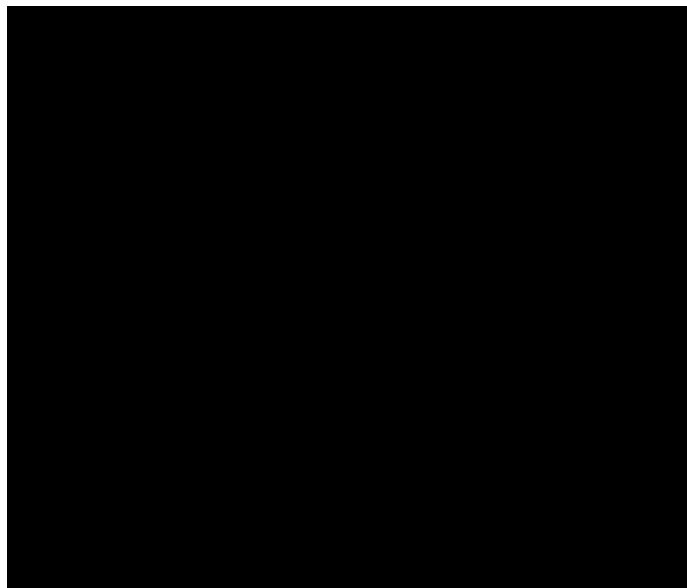
(3) ONR's revised principles for determination of REPPiR off-site emergency planning areas can be found at: <http://www.onr.org.uk/depz-onr-principles.htm>

(4) Navy Command's 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) and comprises of a minimum distance of 1.5 km from the operational berth, in the Council's current Clyde Off Site Emergency Plan for the berth.

Distribution

Navy Command on behalf of MOD
HMNB Clyde
Defence Nuclear Safety Regulator
Queens Harbour Master Clyde
Maritime and Coastguard Agency:
Environment Agency
Scottish Environmental Protection Agency
Food Standards Agency
Food Standards Scotland
Department for Business, Energy and Industrial
Strategy
Scottish Government
ONR



Attachment to Letter Un. No MOD70030, dated 28th February 2017: Map of Loch Gail Operational Berth 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 off-site emergency planning area is generally a circular area of 1.5 km radius from the Operational Berth over the marine and land environments, and extending to include those properties lying adjacent to the 1.5 km minimum boundary.

