



PROJECT ASSESSMENT REPORT			
Unique Document ID and Revision No:	ONR-OFD-PAR-18-028 Revision 0	TRIM Ref:	[REDACTED]
Project:	Approval of Revisions to the Approved Emergency Arrangements under Licence Condition 11(3)		
Site:	Rosyth Royal Dockyard		
Title:	Licence Condition 11 – Emergency Arrangements Approval of “Licence Condition 11 – Emergency Arrangements, Issue 09, February 2018” under Licence Condition 11(3)		
Licence Instrument No: (if applicable)	Approval 511		
Nuclear Site Licence No:	Sc8		
Licence Condition:	11		

Document Acceptance and Approval for Issue / Publication

Role	Name	Position	Signature	Date	TRIM Ref
Author	[REDACTED]	[REDACTED]	[REDACTED]	05/03/2019	<i>Revision 1-6</i>
Reviewer	[REDACTED]	[REDACTED]	[REDACTED]	04/03/2019	<i>Revision 7-9</i>
Accepted by ¹	[REDACTED]	[REDACTED]	[REDACTED]	12/03/2019	<i>Revision 11</i>
Approval for publication ²	[REDACTED]	[REDACTED]	[REDACTED]	12/03/2019	<i>Revision 11</i>

Revision History

Revision	Date	Author(s)	Reviewed By	Accepted By	Description of Change
A	05/03/2019	[REDACTED]	[REDACTED]	n/a	1 st draft for DL review
B	06/03/2019	[REDACTED]	[REDACTED]	n/a	2 nd draft incorporating DL comments
0	12/03/2019	[REDACTED]	[REDACTED]	[REDACTED]	First accepted issue

¹ Acceptance of the PAR to allow release of LI

² Approval is for publication on ONR web-site, after redaction where relevant

Circulation (latest issue)

Organisation	Name	Date
Office for Nuclear Regulation	[REDACTED]	27 March 2019
Licensee	[REDACTED]	27 March 2019

**Approval of Licence Condition 11 – Emergency Arrangements, Issue 09, February 2018
under Licence Condition 11(3)**

Licence Condition 11 for Rosyth Royal Dockyard

Project Assessment Report ONR-OFD-PAR-18-028
Revision 0
12 March 2019

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Published 03/19.

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EXECUTIVE SUMMARY

Title

Approval of Licence Condition 11 – Emergency Arrangements, Issue 09, February 2018 under Licence Condition 11(3).

Permission requested

This project assessment report relates to a request from Rosyth Royal Dockyard Limited for regulatory Approval of amendments to the Rosyth Royal Dockyard Emergency Arrangements of nuclear site licence Sc8. Any Approval from the Office for Nuclear Regulation will be given under Licence Condition 11(3) as this is an amendment to approved arrangements.

Background

Licence Condition 11, Emergency Arrangements, requires the licensee to make and implement adequate arrangements for dealing with any accident or emergency arising on the site and their effects. In order to comply with this requirement Rosyth Royal Dockyard Ltd has produced documentation titled 'Emergency Arrangements' which has been approved by the Office Nuclear Regulation. The current version of the emergency arrangements was approved by ONR in July 2015.

The changes are to reflect the site licence variation No.5 (removal of No.3 dock and facilities around No.2 dock, granted March 2016), and the inclusion of the current operations being undertaken on the No.2 dock into the document. Rosyth Royal Dockyard Ltd is seeking ONR Approval for these amendments.

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

The impact of the changes to the emergency arrangements have been reviewed and confirmed that the changes are to reflect site licence variation No.5, and the inclusion of Submarine Dismantling Programme phase 1 activities on No.2 dock. Due to the limited radiological inventory associated with the licensee activities on No.2 dock, no credible accident scenario has been identified which would lead to a Nuclear Emergency Response Organisation being required. Therefore no consequential safety impact due to the changes to the emergency arrangements has been identified. It was also confirmed that the changes have been subject to the licensee's due process, having been considered by the Nuclear Safety Committee.

It was confirmed that there are no additional changes in operations on the site, which would require a change to the existing emergency arrangements.

Matters arising from ONR's work

There are no regulatory issues or concerns arising from this assessment. The changes to the document are administrative to reflect the variation in the nuclear licenced site boundary and the inclusion of new activities being undertaken on No.2 dock. Due to the limitations of these no consequential safety impact has been identified.

Conclusions

This report presents the findings of the assessment of the revised emergency arrangements submitted by Rosyth Royal Dockyard Ltd for Approval

To conclude, the revised emergency arrangements satisfy the requirements of LC11.

Recommendation

The project assessment report recommends that Approval is given under LC11(3) for the revised Rosyth Royal Dockyard Ltd Licence Condition 11 - Emergency Arrangements Issue 09, February 2018, and that Licence Instrument 511 be signed by the Deputy Chief Inspector.



LIST OF ABBREVIATIONS

AWAF	Active Waste Accumulation Facility
CM	Content Manager (ONR Records Management System)
HOW2	(Office for Nuclear Regulation) Business Management System
ILW	Intermediate Level Waste
LACP	Local Access Control Point
LC	Licence Condition
LLW	Low Level Waste
NERO	Nuclear Emergency Response Organisation
ONR	Office for Nuclear Regulation
RPV	Reactor Pressure Vessel
RRDL	Rosyth Royal Dockyard Limited
RVP	Rendezvous Point
SDP	Submarine Dismantling Programme

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1 PERMISSION REQUESTED

1. On 5 April 2018, Rosyth Royal Dockyard Limited (RRDL) submitted the Licensee's emergency arrangements [Ref. 3] to the Office for Nuclear Regulation (ONR) for Approval. Any Approval from ONR will be given under Licence Condition 11(3) as this is an amendment to Approved arrangements.

2 BACKGROUND

2. Licence Condition 11, Emergency Arrangements, requires the licensee to make and implement adequate arrangements for dealing with any accident or emergency arising on the site and their effects. In order to comply with this requirement RRDL has produced documentation titled 'Emergency Arrangements', which has previously been Approved by ONR. The current version of the emergency arrangements was Approved by ONR in July 2015 [Ref. 4].
3. The previous ONR Approval of the emergency arrangements acknowledged preparations were being made ahead of the licensee's submission to remove No.3 dock and areas of No.2 dock as part of a site licence variation. The previous ONR assessment also identified that the licensee was at the early stages of planning to complete the Submarine Dismantling Programme (SDP) phase 1 operations on No.2 dock [Ref. 5].
4. In the period since the emergency arrangements were last approved by ONR a variation to the nuclear licenced site boundary (variation No.5) has been granted by ONR [Ref.6]. The variation reduced the size of the nuclear licenced site boundary, through the removal of No.3 dock and a selection of facilities around No.2 dock. It was deemed that the removal of the areas from the licenced site boundary would not impact the emergency arrangements, and they were not revised at this point.
5. The changes submitted here are to reflect the changes from the site licence variation No.5 [Ref.6] and the inclusion of activities being undertaken on the No.2 dock into the document; specifically activities associated with the SDP phase 1. RRDL is now seeking ONR Approval for these amendments. The Approval will enable RRDL to update the supporting 'lower tier' documentation, primarily 'The Rosyth Emergency Plan (Site Incidents)'.

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

6. The changes to the emergency arrangements [Ref. 7] as a result of the site licence variation and the inclusion of activities on No.2 dock have been reviewed, in line with ONR Technical Inspection Guide (TIG) 'LC 11 – Emergency Arrangements' (NS-INSP-GD-011, Revision 5). The licensee has identified that, based upon the current operations on No.2 dock, that no credible accident scenario has been identified which would lead to a Nuclear Emergency Response Organisation (NERO) being required to stand up. This is due to the limited radiological inventory associated with the activities being undertaken on No.2 dock. It has been confirmed that no event has been identified in No.2 dock which would lead to the requirement of the NERO being stood up [Ref. 7].
7. Operations on No.2 dock are limited to those defined under phase 1 of the SDP. This limits activities to the retrieval of low level waste (LLW), which is then stored in the Active Waste Accumulation Facility (AWAF) on the licenced site, prior to transfer from the site. It was also confirmed, by reviewing intervention and contact reports across a number of Content Manager (CM) folders, and discussions with the ONR Nominated Site Inspector, that there are no additional changes in the current operations on the

site outside of this submission which would require a change to the emergency arrangements.

8. The amended emergency arrangements identify an additional Local Access Control Point (LACP) and Rendezvous Point (RVP) on No.2 dock. Whilst no credible NERO accident has currently been identified for the No.2 dock, the licensee intends for the LACP to be used as a focal point for any contingency plans or conventional emergencies.
9. It was also confirmed that the changes have been subject to the licensee's due process, having been considered by the Nuclear Safety Committee [Ref.8]. Minor amendments were discussed and have been incorporated within the received submission [Ref. 7].
10. It is noted that the licensee is at the early stages of preparing for phase 2 of SDP. Phase 2 activities involve the removal of intermediate level waste (ILW), including the reactor pressure vessel (RPV).
11. As part of RRDL implementation of phase 2 of SDP, ONR expects a further review of the adequacy of the emergency arrangements, proportionate to the change in hazard, to be carried out, ahead of implementation.

4 MATTERS ARISING FROM ONR'S WORK

12. There are no regulatory issues or concerns arising from this assessment. The changes to the document are to reflect the variation to the nuclear licenced site boundary and inclusion of activities being undertaken on No.2 dock. Due to the limitations of activities in SDP phase 1, no consequential nuclear safety impact on the emergency arrangements has been identified. Based on this review and discussions with the ONR Nominated Site Inspector, there are no additional changes to operations on the site since the previous arrangements were approved.
13. Supporting the Rosyth emergency arrangements is the lower tier document, 'The Rosyth Emergency Plan (Site Incidents)' [Ref. 9]. The licensee's current emergency plan [Ref. 9] pre-dates site licence variation No.5. ONR's assessment of the licenced site variation identified that the reduction of the site did not impact the emergency arrangements or plan, and it was therefore not updated by the licensee at the time. In line with the licensee's arrangements, the Rosyth emergency plan will go to the Nuclear Safety Committee upon receipt of the ONR LC11(3) Approval. This has been discussed with the RRDL Emergency Planning Manager [Ref. 10], and assurance was provided that the review of the Emergency Plan is underway.

5 CONCLUSIONS

14. This report presents the findings of the assessment of the revised emergency arrangements submitted by RRDL for Approval.
15. To conclude, the revised emergency arrangements satisfy the requirements of LC11.

6 RECOMMENDATIONS

16. The project assessment report recommends that Approval is given under LC11(3) for the revised RRDL "Licence Condition 11 - Emergency Arrangements, Issue 09, February 2018" [Ref. 7] and that Licence Instrument 511 [Ref. 11] be signed by the Deputy Chief Inspector.

7 REFERENCES

1. *ONR HOW2 Guide - Purpose and Scope of Permissioning - NS-PER-GD-014 Revision 4*. July 2014. <http://www.onr.org.uk/operational/assessment/index.htm>
2. *Safety Assessment Principles for Nuclear Facilities*. 2014 Edition Revision 0. November 2014. <http://www.onr.org.uk/saps/saps2014.pdf>.
3. Submission of Emergency Arrangements for Approval, letter from RRDLD dated 5 April 2018. [CM: 2019/53521]
4. Licence Instrument 506, July 2015. [CM: 2015/250881]
5. Approval of Revisions to the Approved Emergency Arrangements Licence Condition 11 for Rosyth Royal Dockyard, ONR-DEF-PAR-15-001, Revision 0, 03 June 2015. [CM: 2015/144173]
6. ONR Variation No.5 to Site Licence Sc.8 March 2016. [CM 2016/126829]
7. Rosyth Royal Dockyard Limited, LC11 Emergency Arrangements, Issue 09, February 2018. [CM: 2019/53533]
8. Minutes of the 94th Meeting of the Rosyth Royal Dockyard Ltd Nuclear Safety Committee, 22 March 2018. [CM: 2018/126352].
9. The Rosyth Emergency Plan (Site Incident), CP/NUC/2/031, Issue 15, April 2013. [CM 2014/355389]
10. Email A Robertson, 14th January 2018. [CM: 2019/54163]
11. Rosyth, RRDLD, LC 511, Approval granted under Condition 11(3) [CM 2019/5494].