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| ONR Site Report  BAE Systems Marine Limited – Devonshire Dock Complex |



ONR Site Report

BAE Systems Marine Limited – Devonshire Dock Complex

Report for period: 01 July – 31 December 2022

Authored by: R Wilson, Nominated Site Inspector

Approved by:

Issue No.: 0

Publication Date: August 2023

ONR Record Ref. No.: 2023/41435

Foreword

This report is issued as part of ONR's commitment to make information about inspection and regulatory activities relating to the above site available to the public. Reports are distributed to members for the BAE Systems Marine Limited (BAESML) Local Liaison Committee (LLC) and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend BAESML LLC meetings where these reports are presented and will respond to any questions raised there. Any person wishing to inquire about matters covered by this report should contact ONR.

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# Inspections

## Date(s) of Inspection

ONR inspectors made inspections on the following dates during the report period:

* 11 August;
* 29 & 30 September;
* 19 October; and
* 1, 22, 23 & 24 November.

# Routine Matters

## Inspections

Inspections are undertaken as part of the process for monitoring compliance with:

* the conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
* the Energy Act 2013;
* the Health and Safety at Work etc Act 1974 (HSWA74); and
* regulations made under HSWA74, for example the Ionising Radiations Regulations 2017 (IRR17) and the Management of Health and Safety at Work Regulations 1999 (MHSWR99).

The inspections entail monitoring the licensee’s actions on the site in relation to incidents, operations, maintenance, projects, modifications, safety case changes and any other matters that may affect safety. The licensee is required to make and implement adequate arrangements under the conditions attached to the licence in order to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and their implementation.

In this period, routine inspections of the Devonshire Dock Complex covered the following:

* staff training, qualifications and experience;
* modifications to plant, equipment and safety cases;
* emergency preparedness;
* incidents on the site; and
* conventional (non-nuclear) health and safety.

Members of the public, who would like further information on ONR’s inspection activities during the reporting period, can view site Intervention Reports at [www.onr.org.uk/intervention-records](http://www.onr.org.uk./intervention-records) on our website [www.onr.org.uk](http://www.onr.org.uk).

Should you have any queries regarding our inspection activities, please email [contact@onr.gov.uk](mailto:contact@onr.gov.uk).

## Annual Review

In December 2022, ONR attended BAESML’s annual review, where BAESML considers its safety, environmental and operations performance over the year to identify areas of strength and areas for improvement. Though ONR felt that this review lent more towards a programme progress review, ONR agreed that BAESML’s nuclear safety compliance is acceptable and welcomed BAESML’s self-reflection and self-awareness, as well as the identified areas for improvement. ONR stated that BAESML’s conventional safety performance is a key focus for 2023, given the nature of BAEMSL’s operations and noting learning from events involving lifting and working at height.

## Emergency Exercise ‘INDIGO’

In October 2022, a team of six ONR inspectors observed BAESML's emergency demonstration exercise 'INDIGO 22', making observations in the Nuclear Emergency Headquarters (tactical & operational), Exclusion Zone Reception Centre, and technical cell, as well as observations of the deployed teams.

Whilst some individual good performances were noted, after considering the totality of the observations made on the day, ONR judged that it was not an adequate demonstration of BAESML’s emergency arrangements, and that a full redemonstration was necessary, to be undertaken by the end of April 2023.  Key themes identified in the observations were a significant lack of demonstrable situational awareness and poor communication and information flow, both within and between groups.  A level 3 regulatory issue was created to track BAESML’s progress in identifying and addressing the shortfalls.

## D58 Primary Build Complex – Installation of Main Crane: Release of Hold Point

The construction of D58 Primary Build Complex (PBC) is a key part of the licensee’s Site Redevelopment Programme, in support of the Dreadnought Class Submarine programme. BAESML submitted an updated safety case to justify completion of installation activities in the main building. Currently, there is no nuclear material within D58 and hence no immediate nuclear safety risk posed by the installation work itself within D58. Any interactions with existing nuclear safety cases will be addressed via separate future proposals, subject to existing site licence condition arrangements and were therefore not within the scope of this decision. The purpose of this permissioning hold point was to prevent foreclosure of options, in line with ONR’s guidance on permissioning purposes and use.

ONR had already considered most of the significant risks identified by the licensee prior to permissioning the main construction, however, the supporting safety case at that time had some significant areas where the design substantiation or the safety case was incomplete and was planned for completion to support this hold point. ONR therefore carried out a programme of work to gain sufficient regulatory confidence to release the hold point through a targeted assessment of the submission and supporting documentation.

ONR, through the assessment work undertaken by specialist inspectors, considers that BAESML has updated its design substantiation and supporting safety case and judges that the remaining and new recommendations (captured in a regulatory issue) do not foreclose options in relation to the proposed installation of Structures, Systems and Components important to nuclear safety, and can be addressed during the installation and inactive commissioning phases, prior to active use. Therefore, ONR released the hold point.

## Other Work

The site inspector held a periodic meeting with safety representatives, to support their function of representing employees and receiving information on matters affecting their health, safety and welfare at work.

BAESML schedules regular regulatory interface meetings (RIF) covering an overview of the build programmes, and improvements to the site safety cases and their implementation. The RIFs also cover regulatory issues progress and oversight of the site redevelopment project (SRP) work. This includes regulatory oversight of the construction of the new facilities on the licensed site. The ONR Site and Project Inspectors attended these meeting (usually virtually) during the period.

At the quarterly regulatory interface meetings (known as the ‘Level 3 RIF’) ONR were, along with DNSR, the Environment Agency and BAESML, able to agree the Submarine Nuclear Safety Hold Point Control Plan and SRP Overarching Strategy & Regulatory Hold Point Control documents. These documents set out an agreed position between regulators and the dutyholder as to when ONR will engage with projects, where BAESML will seek specific permissions to proceed and what engagement will take place to support these permissions.

# Non-Routine Matters

Licensees are required to have arrangements to respond to non-routine matters and events. ONR inspectors judge the adequacy of the licensee’s response, including actions taken to implement any necessary improvements.

There were no such matters or events of significance during the period.

# Regulatory Activity

ONR may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, ONR issues regulatory documents, which either permit an activity or require some form of action to be taken; these are usually collectively termed ‘Licence Instruments’ (LIs) but can take other forms. In addition, inspectors may take a range of enforcement actions, to include issuing an Enforcement Notice.

* No LIs, Enforcement Notices or Enforcement letters were issued during this period.

ONR did however release a hold point for the installation of the main crane within the D58 Primary Build Complex, via ‘Enhanced Implementation, Monitoring & Control’. Further detail is provided in section 2.4.

# News from ONR

For the latest news and information from ONR, please read and subscribe to our regular email newsletter ‘ONR News’ at [www.onr.org.uk/onrnews](http://www.onr.org.uk/onrnews).

# Contacts

Office for Nuclear Regulation

Redgrave Court

Merton Road

Bootle

Merseyside

L20 7HS

website: [www.onr.org.uk](http://www.onr.org.uk)

email: [Contact@onr.gov.uk](mailto:Contact@onr.gov.uk)

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