



# Office for Nuclear Regulation (ONR) Quarterly Site Report for HM Naval Base Clyde

Report for period 1 October 2014 – 31 December 2014

## 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 quarterly to members for the Clyde Local Liaison Committee and are also available on the ONR website (<http://www.onr.org.uk/llic/>).

Site inspectors from ONR usually attend Clyde Local Liaison Committee meetings 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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## 1 INSPECTIONS

The majority of sites inspected by ONR are licensed under the Nuclear Installations Act 1965. HM Naval Base Clyde is not a licensed site, although it operates under authorisation from the Ministry of Defence (MoD) Defence Nuclear Safety Regulator (DNSR). The site comprises the Faslane and Coulport facilities and is regulated by ONR through other legislation as noted below. This report summarises the inspection and regulatory activities associated with HM Naval Base Clyde which are co-ordinated with inspections by DNSR.

### 1.1 Dates of inspection

The ONR site inspector carried out inspections on the following dates during the quarter:

26<sup>th</sup> November 2014

## 2 ROUTINE MATTERS

### 2.1 Inspections

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

- the Health and Safety at Work Act 1974 (HSWA74); and
- Regulations made under HSWA74, for example the Ionising Radiations Regulations 1999 (IRR99) and the Management of Health and Safety at Work Regulations 1999 (MHSWR99).

In this period, routine inspections of site covered the following:

The arrangements for investigating incidents on the site (undertaken jointly with DNSR).

The inspection identified shortfalls in a number of areas, in particular the completeness of investigations, the time taken to conclude some investigations, the tracking of corrective actions, and the effectiveness of actions placed. DNSR will follow-up these findings.

### 2.2 Other work

The Site Inspector and the Superintending Inspector attended the annual senior level regulatory interface meeting. The meeting is an opportunity for senior regulatory staff to engage directly with the senior management team of the naval base to review performance and provide any advice. The meeting was considered to accurately represent the duty holder's current performance and noted significant improvement in some areas over the last year.

The Site Inspector witnessed the recovery emergency exercise Long Sermon carried out by Argyll and Bute Council. The exercise was a useful event, and it allowed the participants to gain a better understanding the issues that would need to be addressed in the unlikely event of an emergency, including the interdependencies between the different agencies involved

## 3 NON-ROUTINE MATTERS

Operators are required to respond to non-routine matters and events. ONR inspectors judge the adequacy of the operator's response, including actions taken to implement any necessary improvements. Matters and events of particular note during the period were:

An ONR preliminary investigation into a radiography event

The Site Inspector and a specialist Radiation Protection Inspector carried out a preliminary investigation into an incident that occurred in October 2014 related to radiography on the site,

which was referred to in the last ONR Quarterly report. The duty-holder gave the inspectors full cooperation during the visit.

The incident involved an operator approaching a partially revealed radioactive source, receiving a very small dose of radiation. The local rules required the use of a portable gamma alarm to provide a warning to the operators should the source become exposed. However it had become custom and practice not to use the alarm in certain areas where the background radiation was above the level set for the portable alarm. The local rules had not been amended to reflect this change to the practice, and there was no evidence that the risks had been re-assessed and appropriate alternatives considered.

The inspectors concluded that there had been a non-compliance with the ionising radiations regulations, in that local rules were not followed and that the risk to operators had not been reduced, so far as is reasonably practicable. However the inspectors noted that since the incident the duty-holder had procured a remote reading gamma monitor, which in the inspectors view provided an adequate alternative to the portable gamma alarm for higher background radiation areas.

Following the preliminary investigation and consideration of the requirement for further enforcement action, ONR intends to write to Site highlighting the non-compliance with the regulations and identifying the areas that will need corrective action to help prevent a recurrence.

#### **4 REGULATORY ACTIVITY**

Inspectors may issue Enforcement Notices to secure improvements to safety.

- No Enforcement Notices were issued during the period.

#### **5 NEWS FROM ONR**

Insight into ONR's work as an independent regulator of the nuclear industry can be found in ONR's Quarterly News. The online publication (<http://www.onr.org.uk/onr-quarterly-report.htm>) reports on the key themes and developments in each of ONR's regulatory programmes and provides an update about the ongoing changes at ONR. <http://www.onr.org.uk/index.htm>. For the latest news and updates from ONR visit the website and sign up for our ebulletin (<http://www.onr.org.uk/ebulletin/index.htm>).

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