



Office for Nuclear Regulation (ONR) Quarterly Site Report for Devonshire Dock Complex, Barrow

Report for period 1 July - 30 September 2016

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 BAE Systems Marine Limited Local Liaison Committee (LLC) and are also available on the ONR website (<http://www.onr.org.uk/lc/>).

Site inspectors from ONR usually attend BAE Systems Marine Limited LLC 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

1.1 Dates of inspection

The ONR nominated site nuclear safety inspector and other specialist inspectors made inspections on the following dates during the quarter. This included the assessment of the annual emergency exercise demonstration:

4th to 7th July

27th July

4th August

23rd – 25th August

12th – 15th September

28th September

2 ROUTINE MATTERS

2.1 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 1999 (IRR99) and the Management of Health and Safety at Work Regulations 1999 (MHSWR99).

The inspections entail monitoring 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 Licence Conditions (LCs) attached to the licence in order to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and their implementation. The Licensee is assigned a rating in accordance with the newly implemented Red Amber Green rating system, which commenced on 1 April 2016.

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

- Emergency preparedness
- Unannounced Inspection
- Marking of the Site Boundary
- management of operations including control and supervision

In general, ONR judged the arrangements made and implemented by the site in response to safety requirements to be adequate in the areas inspected. However, where improvements were considered necessary, the licensee made satisfactory commitments to address the issues, and the site inspector will monitor progress during future visits. Where necessary, ONR will take formal regulatory enforcement action to ensure that appropriate remedial measures are implemented to reasonably practicable timescales.

On 6 July 2016, a joint ONR / Defence Nuclear Safety Regulator (DNSR) team assessed the annual demonstration on-site emergency exercise (INDIGO 16). This exercise was to demonstrate BAESML's emergency preparedness and response arrangements, made under the licence and authorisation conditions. ONR judged overall that BAESML had provided an adequate demonstration of their emergency preparedness. However, the licensee agreed to re-demonstrate casualty rescue from an area containing a significant radiological hazard as

this was a less secure feature of the exercise; this will be carried out prior to commissioning of the next submarine.

2.2 10 Yearly Periodic Review of Safety

As a condition of the nuclear site licence BAESML submitted its decennial Periodic Review of Safety (PRS) to ONR in October 2015. This periodic and systematic review and reassessment of safety cases is to determine by means of a comprehensive assessment of existing facilities: the extent to which the plant conforms to current international safety standards and practices; the extent to which the licensing basis remains valid; the adequacy of the arrangements that are in place to maintain plant safety until the next PSR or the end of plant lifetime; and the safety improvements to be implemented to resolve the safety issues that have been identified.

ONR has completed its assessment of the PRS submission for the Barrow licensed site and considers this to have been a comprehensive and systematic review. As a result of this assessment ONR issued a letter to BAESML stating that, subject to the satisfactory and timely completion of the improvements identified in BAESMLs action plan in response to ONR's recommendations, ONR supports a further period of operations at the Devonshire Dock Complex up to the next PRS submission due in 2025.

2.3 Other work

The ONR nominated site nuclear safety 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.

The ONR review of leadership and management for safety was presented on the 4th August to a number of BAESML Board members, including the Managing Director. The review concluded that in terms of Leadership and Management for Safety (LMfS) during 2015, improvements have been made in a number of areas but in other areas progress has been slow and work remains to be progressed.

BAESML staff visited Redgrave Court to present progress with the Barrow site redevelopment programme, which is underway to enable delivery of the Successor class of submarine. This provided ONR with an opportunity to gain an overview of the plans (which will include re-licensing the site) and to find how some of the recent PSR findings are being integrated.

3 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.

4 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 issue Enforcement Notices to secure improvements to safety. There were no LIs or Enforcement Notices issued during the period.

5 NEWS FROM ONR

Regulation Matters magazine

Insight into ONR's work as an independent regulator of the nuclear industry can be found in Regulation Matters. This quarterly online publication (<http://www.onr.org.uk/regulation-matters.htm>) reports on the key themes and developments in each of ONR's regulatory programmes and provides an update about the on-going changes at ONR. For the latest news and updates from ONR, you can also visit the website and sign up for our e-bulletin: <http://www.onr.org.uk/index.htm>.

6 CONTACTS

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