



**Office for Nuclear Regulation (ONR)
Site Report for
Devonport Royal Dockyard
(Devonport Royal Dockyard Ltd and
HM Naval Base Devonport)**

Report for period 1 July to 30 September 2017

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

Site inspectors from ONR usually attend Devonport Local Liaison Committee 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

Dates of inspection

ONR site inspectors made inspections on the following dates during the report period 1 July to 30 September 2017:

- 17 – 21 July 2017
- 7 – 11 August 2017
- 23 August 2017
- 25 August 2017
- 5 – 8 September 2017
- 11 – 15 September 2017

Some of the inspections were carried out with inspectors from the Ministry of Defence's (MOD) internal regulatory organisation, the Defence Nuclear Safety Regulator (DNSR) and the Environment Agency (EA).

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 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 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 Devonport covered the following:

- examination, maintenance, inspection and testing;
- safety systems, structures and components;
- management of operations including control and supervision;
- staff training, qualifications and experience;
- plant construction and commissioning;
- incidents on the site;
- operating rules and instructions;
- safety management systems;
- modifications to plant, equipment and safety cases;
- radiological protection;
- radioactive waste management;
- organisational changes;
- decommissioning;
- conventional fire safety; and
- industrial safety and meeting safety representatives.

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.

Licence Condition Inspection – LC 10: Training and 12: Duly authorised and other suitably qualified and experienced persons

ONR undertook the inspection to assess DRDL's compliance with LC 10 (training) and LC 12 (duly authorised and other suitably qualified and experienced persons).

The inspection found that DRDL were continuing to make progress in developing arrangements, which when fully implemented, will meet regulatory expectations as detailed in technical inspection guidance. A number of shortfalls against regulatory expectations were identified, notably a shortfall in providing a structured approach to on the job training and the formal requirement to assess role-specific competence of all individuals duly authorised under LC 12 (e.g. Duly Authorised Persons (DAPs) and Appointed Suitably Qualified and Experienced Persons (ASQEPs)).

Evidence of local good practices were found, which should be integrated into DRDL's arrangements. DRDL provided assurance that its extant Nuclear Safety Improvement Programme (NSIP) will resolve these shortfalls however timescales and resource remain a challenge. ONR will continue to monitor progress via an extant regulatory issue.

Inspection of Licence Condition LC 18 – Radiological Protection

An inspection of LC 18 (radiological protection) found the arrangements and control of radiological doses to be adequate and no formal improvement action was sought.

Inspection of Licence Condition 27 - Safety mechanisms, devices and circuits (SMDC)

An inspection of LC 27 found the licensee's operational documentation contained arrangements to enable compliance with operating rules, a subset of which defined the availability of safety related plant. The arrangements do not specifically identify SMDCs and the licensee is still carrying out a programme of activities to close the action from a previous ONR inspection to review the adequacy of their arrangements and ensure SMDCs and responsibilities for them are clearly defined. ONR is seeking further improvement and will monitor the site's corrective programme.

Inspection of Licence Condition LC 28 - Examination, inspection, maintenance and testing (EIM&T)

An inspection of LC 28 (examination, inspection, maintenance and testing) was carried out. The scope of the inspection covered management arrangements, but did not include detailed scrutiny of maintenance tasks being carried out because ONR is currently carrying out an investigation on this topic. ONR found that the scheduling of examination, inspection, maintenance and testing (EIMT) activities appeared to be suitably controlled by a software package, maintenance instructions were available, and records were completed correctly and retained. The inspection found that DAPs and SQEPs were appointed to supervise the maintenance work. The inspection also found that the LC 28 documentation did not clearly describe the extent of the maintenance schedule for each facility and many individual maintenance schedules for plant items and systems were not approved for use. ONR is seeking improvements in document control and will monitor corrective actions to ensure that this shortfall is resolved.

Through-Life Management

ONR continues to routinely engage with DRDL to monitor the proactive management of ageing facilities and planning of future facilities.

Greater focus and enhancements of the high level plan is providing ONR with the required confidence in Devonport's management of risk. Challenges remain however in terms of programme confidence and resource availability. Risks associated with the programmes will continue to be monitored via routine, regulatory engagements with both DRDL and the MOD to ensure safe operations across the licenced site.

Licence Condition Sponsors and Owners

Arrangements for appointment of Licence Condition owners have now been implemented with individual owners appointed in writing. ONR recognises this as a significant step forward in the management of Licence Conditions and welcomes the new appointments.

ONR will continue to provide advice and guidance to DRDL and specific Licence Condition owners to influence improvements to site compliance arrangements.

Radioactive Waste Management

DRDL continues to make reasonable progress in delivering improvements to the Nuclear Utilities Building. ONR and the EA continue to hold routine engagements with DRDL.

9 Dock

Routine regulatory engagements continue with the 9 Dock facility in respect to safe operations associated with maintenance of HMS Vanguard.

Following several crane-related events, ONR made the regulatory judgement to serve DRDL with two improvement notices. These are discussed in Non-Routine Matters below.

Submarine Refit Complex (SRC)

DRDL is making final preparations for the removal of the SRC refuelling crane pedestal, this work is expected to be completed as part of the 15 Dock outage scope currently underway. ONR continues to support this work.

Engagement with Safety Representatives

The site inspection team 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.

Inspections at HM Naval Base Devonport

The majority of sites inspected by ONR are licensed under the Nuclear Installations Act 1965 (as amended). HM Naval Base Devonport is not a licensed site although it operates under Authorisation from the Defence Nuclear Safety Regulator (DNSR). The site is regulated by ONR through other legislation as noted below. This report summarises the inspection and regulatory activities associated with HM Naval Base Devonport, which are co-ordinated with inspections by DNSR. Inspections are undertaken as part of the process for monitoring compliance with:

- the Health and Safety at Work etc Act (HSWA) 1974; and
- Regulations made under the HSWA (for example the Ionising Radiations Regulations 1999, the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPPIR) and the Management of Health and Safety at Work Regulations 1999).

There were no inspections undertaken by ONR during the period.

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.

9 DOCK IMPROVEMENT NOTICES

Between May and June 2017, DRDL reported several crane-related events that had occurred on the 9 Dock facility.

Although no one was injured and there was no loss of control of radioactive material during the events, , ONR undertook a series of follow up inquiries which informed a decision to take formal enforcement action against DRDL in the form of issuing two Improvement Notices (INs). One IN was served under Lifting Operations and Lifting Equipment Regulations 1998 and the other IN was served under Licence Condition 28: Examination, inspection, maintenance and testing.

While ONR recognised that the licensee had voluntarily stopped crane operations at 9 Dock in response to the events, ONR considers that the arrangements for lifting operations and crane maintenance at the site fell short of the required standard. The INs were served on 1 August 2017 with a required completion date of 1 December 2017.

ONR has carried out further follow-up enquiries which have included voluntary formal interviews with DRDL employees involved in the events. These enquiries are continuing in order to determine whether any further enforcement action is required against DRDL. ONR continues to engage with DRDL, providing advice and guidance on the programme of work required to satisfy the requirements of the notices.

9 DOCK RAH CRANE AND DOCKSIDE CRANE READINESS REVIEWS

Following the above events, DRDL took the conservative decision to self-impose a safety stand-down on all crane activities across the 9 Dock facility. Whilst ONR welcomed this decision, a written request was made for DRDL to place a regulatory hold point on the restart of crane activities.

A combined ONR/ DNSR inspection team undertook a “deep slice” sample into the amended arrangements and improvements that have been made by DRDL in relation to the planning, organisation, control and supervision of crane activities within 9 Dock. The inspection team concluded that while there was still further work required for DRDL to meet the requirements of the two Improvement Notices, sufficient improvements had been made to demonstrate the safe control of dockside crane operations on 9 Dock. It was also noted that there was a systematic internal hold point control process in place to allow DRDL to adequately control and release defined internal hold points prior to resumption of dockside crane operations.

Based on these points, ONR considered that it would be disproportionate to withhold permission for DRDL to restart maintenance activities and operations on the cranes and therefore released the regulatory hold points.

ONR intends to monitor the effectiveness of this structured return to maintenance and operations in forthcoming routine site interventions and readiness reviews.

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.

- The following LIs and Enforcement Notices have been issued during the period, these are discussed in the Non-routine section above:

Table 1
Licence Instruments and Enforcement Notices Issued by ONR during this period

Date	Type	Ref No	Description
01/08/17	Improvement Notice	ONR-IN-17-003	9 Dock Facility Devonport Royal Dockyard Health and Safety at work etc. Act 1974, Sections 2(1) and 3(1) Lifting Operations and Lifting Equipment regulations 1998; regulation 8(1)
01/08/17	Improvement Notice	ONR-IN-17-004	9 Dock Facility Devonport Royal Dockyard Licence Condition 28(6): Examination, inspection, maintenance and testing.

Reports detailing the above regulatory decisions can be found on the ONR website at <http://www.onr.org.uk/pars/>.

NEWS FROM ONR

ONR has appointed Mark Fo as Chief Nuclear Inspector. Mark is ONR's longest-serving senior regulator and was previously Deputy Chief Nuclear Inspector and Director of the Operating Facilities Division.

ONR will soon launch its new newsletter containing the latest news and developments from across the organisation. If you would like to receive this, please subscribe on the [ONR website](#).

Insight into ONR's work as an independent regulator of the nuclear industry can be found in ONR's Regulation Matters. The 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 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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