



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

Report for period 1 January – 31 March 2018

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

Site inspectors from ONR usually attend BAE Systems Marine Limited 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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1 INSPECTIONS

1.1 Dates of inspection

The ONR inspectors visited site on the following dates during the report period 1 January to 31 March 2017:

- 15-18 January 2018
- 7 February 2018
- 15 February 2018
- 7-8 March 2018
- 21 March 2018

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 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 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, Barrow covered the following:

- Organisational Capability;
- Examination, maintenance, inspection and testing;
- Staff training; and
- Operating rules and instructions.

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.

Organisational Capability

ONR inspectors carried out an intervention to gain assurance that BAE Systems Marine Limited (SML) has suitable and sufficient organisational structures, staffing and competences in place to effectively and reliably carry out power range testing for HMS Audacious. The inspection examined BAESML's arrangements for Organisational Capability and the implementation of these arrangements.

Based on the arrangements sampled and the evidence observed ONR considers that BAESML has sufficient organisational capability to control the activities associated with power range testing.

Examination, maintenance, inspection and testing

As part of intervention on docks and quays ONR inspectors sampled specific maintenance tasks and found that although maintenance tasks were being undertaken, there was evidence of failures to implement written arrangements. ONR will raise a regulatory issue to monitor improvement from BAESML in this area progress of which will be reviewed during planned inspections later in 2018

Staff training

As part of intervention on docks and quays ONR inspectors spoke to individuals with a responsibility for operations which may affect safety and sampled specific training records. BAESMLs arrangements and their implementation for training were judged to be adequate.

Operating rules and instructions

As part of intervention on docks and quays ONR inspectors sampled arrangements for operating rules and instructions. Operating rules were found to be appropriate and adequate and appropriately implemented operating instructions were in place to support the operation and maintenance of the docks and quays.

2.2 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.

An ONR Fire Safety Inspector visited site to discuss fire safety aspects of the site redevelopment programme and the primary build capability construction fire safety review. Throughout this period there were a number of telephone and teleconference engagements with site to discuss regulatory engagement with the site redevelopment programme and boat construction activities.

ONR Inspectors attended the Local Liaison Committee meeting.

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.

Matters and events of particular note during the period were:

ONR was made aware of the following incidents on the nuclear licensed site during this period:

- A minor fire on a vessel under construction. There was no harm to workers or the public as a result of this incident and it is being dealt with by the licensee in accordance with its arrangements. ONR has conducted initial follow-up enquiries relating to this event and will consider if further action is required on receipt of the licensee's investigation report in May 2018.
- A gas leak caused by work to install a water manifold. There was no harm to workers or the public as a result of this incident. ONR has conducted initial follow-up enquiries with no immediate action being required. This event will be considered further in the scope of inspection work planned for later in 2018.

- A RIDDOR reportable event where a contractor injured their leg descending a ladder preventing them from working for a period of greater than seven days. ONR is currently seeking further information regarding this event.

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.

- No LIs or Enforcement Notices were issued during the period.

5 NEWS FROM ONR

In January, ONR received the results of its first external stakeholder survey which was undertaken by YouGov on behalf of ONR. A broad range of stakeholders were invited to participate in an online survey, with 351 responses received. In addition to the online survey, a number of in depth interviews were also completed with stakeholders. While overall the results demonstrate ONR is seen as a high performing organisation with good levels of stakeholder confidence, there are areas where improvements can be made and we will be working with our divisions on those in the coming months. Further details about the survey results can be found in our March 2018 newsletter which is available on ONR's website.

In February, ONR held its first webinar following the publication of the 'Guide to enabling regulation in practice.' Chief Nuclear Inspector, Mark Foy and Deputy Chief Inspector, Mike Finnerty, were on hand to answer questions about the guide which has been designed to illustrate working examples of enabling regulation in practice. This is a new channel of communication for ONR and we'll be holding further webinars on different topics over the coming months. If you would like to join future webinars then please get in touch with the ONR Communications team via contact@onr.gov.uk

In March, ONR held the first of two meetings this year with representatives from across the NGO community. Held in Birmingham, the meeting was attended by 15 NGO representatives from 11 different organisations. Topics discussed included: Domestic Safeguards pending the withdrawal of the UK from Euratom; Emergency Planning Arrangements; and the ONR Stakeholder Survey results. The next meeting is scheduled to take place in October 2018. We are keen to increase the number of people engaging with ONR on nuclear safety and security issues and would like to invite members of SSGs, and LLCs to join our engagement programme. For more details please get in touch via contact@onr.gov.uk

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