



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

Report for period 1 October – 31 December 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 the site on the following dates during the report period 1 October to 31 December 2018:

- 8 – 9 October 2018
- 31 October 2018
- 7-8 November 2018
- 28 November 2018
- 12 December 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:

- Control and Supervision
- Organisational Capability
- Safety Mechanisms Devices and Circuits
- Maintenance.

Control and Supervision

On 7 – 8 November, ONR (accompanied by DNSR) Inspectors carried out an inspection of the arrangements made under Licence Condition (LC) 26 Control and Supervision and Licence Condition (LC) 36 Organisational Capability. ONR found that control arrangements were adequate and they were implemented effectively across site operation, boat build and commissioning work areas. Whilst BAESML had identified supervisors for activities important to safety and supervisors were able to demonstrate their understanding of the role and how they carried out this role at the workplace, BAESML recognised that the written arrangements setting out the specific expectations for this work were still maturing. Therefore, ONR

reaffirmed an earlier inspection finding that some improvement in this area was required and agreed with BAESM that they would continue to develop these arrangements and implement the improvements by mid 2019.

During this inspection ONR verified that elements of a recent organisational change that related to control and supervision had been implemented effectively and hand over of responsibilities important to safety for control and supervision was being actively managed. Therefore ONR judged that the arrangements for LC 36 relevant to organisation change for being adequately implemented.

Maintenance

On 19 December ONR inspectors, supported by DNSR, carried out an inspection of BAESML's arrangements made under Licence Condition (LC) 27 Safety Mechanisms Devices and Circuits and Licence Condition (LC28) for Examination, Inspection, Maintenance and Testing. This included a review of BAESML's written arrangements, holding meetings with personnel responsible for managing the arrangements and conducting and managing maintenance activities, and sampling maintenance records and witnessing maintenance activities on the ship-lift. ONR concluded that, for both licence conditions, the arrangements and their implementation was adequate.

2.2 Other work

Site Redevelopment Project

ONR met with the Site Redevelopment Team on 8th October to discuss civil and structural engineering aspects of the design and construction work currently underway on the new facilities to support the Dreadnought Class build programme.

Annual Review of Safety

The ONR Superintending Inspector attended site on 12 December for the Annual Review of Safety, where BAE presented to Regulators their assessment of compliance, operational programmes and site redevelopment plans and the aspects of BAESML strategic objectives relevant to safety performance. ONR concurred with BAESMLs self assessment and noted that the meeting was conducted effectively and in line with ONR's guidance.

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.

On 19th December, whilst on site for a scheduled inspection, an ONR inspector visited a workshop in the Devonshire Dock Hall (DDH) where a failure in a smoke extraction unit had occurred, leading to smoke being generated in the work area and resulting in activation of the fire alarm. ONR observed that BAESML had responded effectively, and had put in place actions to prevent any reoccurrence and assess the root causes. ONR informed BAESML that they would monitor as part of routine inspection arrangements in early 2019.

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.

- None this period

News from ONR – October - December, 2018

October:

- We welcomed the [publication](#) of the key review of operational safety performance at Torness nuclear power station, published by the International Atomic Energy Agency and the UK government. The report highlights eight areas of good practice at Torness and offers proposals for further improvements, which we fully support.
- Following our decision to prosecute, EDF Energy Nuclear Generation Ltd and Doosan Babcock Ltd pleaded guilty to offences at Hinkley Point B under the Health & Safety at Work etc. Act 1974, section 3(1) and the Work at Height Regulations 2005, Regulation 4(1) respectively. The incident was a conventional health and safety matter, with no radiological risk to workers or the public. [A sentencing date](#) has been set for 1 February 2019 at Taunton Crown Court.

On 1 February 2019 EDF Energy were fined £200,000 and Doosan Babcock £150,000. The companies were also ordered to each pay half of the prosecution costs of £36,353.84

The sentencing marks the conclusion of a prosecution brought by ONR for offences under the Health & Safety at Work etc. Act 1974, section 3(1), (in relation to EDF Energy), and the Work at Height Regulations 2005, Regulation 4(1), (for Doosan Babcock).

The full [press statement](#) is available on our website.

November:

- Following a rigorous procurement process, we appointed six nuclear supply chain organisations to our new [Technical Support Framework \(TSF\)](#). The new TSF, which came in to effect on 1 November 2018, has been established to provide a renewed and modernised framework for procuring technical support. We use this technical support to obtain, for example, expert technical assessments, access to specialist software or modelling, or access to niche skill sets that we do not retain in-house.

- The revised Nuclear Safety Directive introduced a European system of Topical Peer Review in 2017 and every six years thereafter. We played a leading role in the preparations for the first European ‘Topical Peer Review’ on Ageing Management of Nuclear Power Plants and welcome the publication of the [first peer review report](#) by the European Nuclear Safety Regulator Group. We are pleased that a number of our experts made a valuable contribution to the exercise alongside 16 European countries as well as Norway, Switzerland and Ukraine. The UK report was authored jointly between ourselves, EDF Nuclear Generation Ltd and EDF-NNB GenCo.
- [The Atomic Weapons Establishment \(AWE\) was fined £1 million](#) after admitting offences under Section 2 (1) of the Health and Safety at Work etc. Act (1974). The incident, which occurred on 27 June 2017 was a conventional health and safety matter and there was no radiological risk to workers or the public. The prosecution was the result of our investigation into the incident.
- In conjunction with the Environment Agency, we announced the completion of our [initial high level scrutiny](#) of the UK HPR1000 reactor design.
- We provided NNB Genco (HPC) Ltd (NNB GenCo) with [consent](#) to commence the unit 1 Nuclear Island concrete pour at Hinkley Point C (HPC). We also hosted our third webinar to explain our permissioning role for the Nuclear Island concrete pour at HPC and to provide information on our work to ensure that the new nuclear power station is built to the standards expected in the UK. Amongst others, a number of Site Stakeholder Group members joined the webinar and we received excellent feedback. We are planning further webinars on various topics in 2019. If you would like to find out more, please contact the ONR Communications team at contact@onr.gov.uk
- After 16 years of decommissioning work, Bradwell became the first of the Magnox nuclear power stations to receive our permission to enter into a period of “care and maintenance”.
- The nuclear safeguards regulations which will enable ONR to set up the domestic safeguards regime following Euratom withdrawal, were laid in Parliament. The Government published the details, [alongside its response and the feedback to consultation on the draft regulations on its website](#).

December:

- [Court proceedings continued](#) in our [prosecution of Sellafield Ltd](#) for offences under Section 2 (1) of the Health and Safety at Work etc Act (1974).
- Reactor 3 at Hunterston B remains offline after being shut down following a routine inspection into cracks in its graphite core, in March 2018. [Cracking of the graphite bricks in Advanced Gas-cooled Reactors](#) such as Hunterston B is expected as the reactors age. However, the number of cracks found during the inspection of Reactor 3 has led to the licensee, EDF Nuclear Generation Limited, carrying

out further inspections of the core. Reactor 4 at Hunterston B was taken offline in October for an inspection of its graphite core. EDF Energy has submitted a safety case for Reactor 4 and is preparing one for Reactor 3. We will assess both safety cases to determine whether the reactors are safe to return to service. Neither reactor may restart without our consent, which we will give only if it is safe to do so.

- The Government published a [Written Ministerial Statement](#) on implementing Geological Disposal, announcing the publication of its [Working With Communities](#) policy and the launch of a consent-based process to find a site to host a Geological Disposal Facility (GDF). While we have no formal role in identifying the site for a GDF, any future facility will need to meet the high standards of safety and security required of a licensed nuclear site.

All our latest news is available on our website www.onr.org.uk

ENDS

5 CONTACTS

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