



**Office for Nuclear Regulation (ONR)
Site Report for
Rolls-Royce Marine Power Operations Limited
(RRMPOL) Raynesway, Derby
Nuclear Fuel Production Plant (NFPP) and Neptune
Reactor Licensed Sites**

Report for period 1 January to 31 March

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

Site inspectors from ONR usually attend Rolls-Royce 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.

TABLE OF CONTENTS

1	INSPECTIONS	3
2	ROUTINE MATTERS	3
3	NON-ROUTINE MATTERS	4
4	REGULATORY ACTIVITY	5
5	NEWS FROM ONR	5
6	CONTACTS	5

1 INSPECTIONS

1.1 Dates of inspection

ONR inspectors attended site on the following dates during the quarter:

- 24-25 January 18.
- 31 January 18.
- 9 February 18.
- 14 February 18.
- 19-20 February 18.
- 28 February 18.
- 21-22 March 18.
- 26-28 March 18.

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 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 Rolls-Royce Marine Power Operations Limited (RRMPOL) Raynesway, Derby covered the following:

- Emergency preparedness.
- Fire Safety.
- Examination, maintenance, inspection and testing.
- Staff training.
- Operating rules and instructions.

Fire Safety

An ONR Fire Safety Inspector carried out an intervention to ensure that RRMPOL is complying with the requirements of the Regulatory Reform (Fire Safety) Order 2005 (RRO).

A number of facilities were inspected including the Manufacturing Facility First Build (MF1B) project, Valiant House and the Product Assembly Building (PAB) construction site, where fire risk assessments and their implementation were compared to best practise. No deficiencies that seriously impact on fire safety were identified. No additional regulatory action is needed as a result of the findings of this intervention.

Examination, inspection, maintenance and testing (EIMT)

On inspection of arrangements and their implementation in one of the facilities with the nuclear fuel production plant, ONR inspectors judged that improvements are required for civil

aspects of EIMT, however overall it was concluded that RRMPO's EIMT arrangements meet regulatory expectations.

Staff training

On inspection of arrangements and their implementation in one of the facilities within the nuclear fuel production plant, ONR inspectors noted the improvements made to RRMPO's training arrangements. It is expected that once the programme of improvement is completed, RRMPO's training process will then be in line with regulatory expectations.

Operating rules and instructions

Operations sampled within the nuclear fuel production facility were judged to be controlled and carried out in accordance with identified operating rules. Associated operating instructions were available and provided clear identification of the limits and conditions specified by the safety case.

Conventional Health and Safety Visit

ONR conventional health and safety inspectors carried out an inspection on site focussing on arrangements for the control and management of asbestos and the risk assessment process for the use of machinery. Improvements to the management of asbestos were evident and the asbestos actions raised following an inspection in 2016 have been satisfactorily addressed. However, shortfalls were observed with regard to the identification of the risks arising from the use of metal working fluids; leading to inconsistent standards for managing risks to workers, with some key relevant statutory provisions not being met. ONR has written to RRMPO to seek improvement in this area and will follow this up as part of normal regulatory engagement.

Observation of shift emergency exercise

ONR inspectors witnessed a shift emergency exercise, where RRMPO demonstrated the improvements made to their emergency arrangements for the handling of multiple contaminated casualties. This was in response to shortfalls observed by ONR inspectors during the level 1 annual demonstration of emergency arrangements in November 2017. ONR consider that RRMPO has now adequately addressed the shortfalls, and has satisfied the requirement for an adequate demonstration of the implementation of the nuclear emergency arrangements for the Raynesway site.

Regulatory meetings

ONR inspectors attended both level 2 (Annual Review of Safety and Environment) and level 3 regulatory engagement meetings during this period.

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.

Throughout this period there were a number of meetings and telephone/teleconference engagements with site to discuss regulatory engagement regarding facility construction and refurbishment on site.

The ONR Chief Nuclear Inspector visited the site during this period.

3 NON-ROUTINE MATTERS

Licencees 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.

- 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

6 CONTACTS

Office for Nuclear Regulation
Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS
website: www.onr.org.uk
email: contact@onr.gov.uk

This document is issued by the Office for Nuclear Regulation (ONR). For further information about ONR, or to report inconsistencies or inaccuracies in this publication please visit <http://www.onr.org.uk/feedback.htm>.

© Office for Nuclear Regulation, [2018]

If you wish to reuse this information visit www.onr.org.uk/copyright.htm for details.

Published 05/18

For published documents, the electronic copy on the ONR website remains the most current publicly available version and copying or printing renders this document uncontrolled.