



Office for Nuclear Regulation (ONR)
Site Report for
Rolls-Royce Submarines Limited (RRSL) Raynesway,
Derby
Nuclear Fuel Production Plant (NFPP) and Neptune
Reactor Licensed Sites

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/llc/>).

Site inspectors from ONR usually attend Rolls Royce Submarines 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 June to 30 September 2018:

- 29-31 October 2018.
- 06 November 2018.
- 14-15 November 2018.
- 27 November 2018.
- 07 December 2018.
- 17 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 2017 (IRR17) 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 Rolls-Royce Submarines Limited (RRSL) Raynesway, Derby covered the following:

- Emergency preparedness.
- Decommissioning.

Decommissioning

ONR Inspectors conducted an inspection on decommissioning. This focused on the RRSL's decommissioning strategy, decommissioning plan and their consideration of decommissioning within initial design work.

Based upon the evidence sampled, ONR Inspectors judged that the regulatory expectation to consider decommissioning during the initial design phase of a project has been met within RRSL's arrangements. However, the Inspectors concluded that RRSL's decommissioning strategy and facility decommissioning plans do not currently align with the pace of work and site regeneration being undertaken across both licenced sites. Their review of these plans is also not in line with their own arrangements.

A regulatory issue has been raised to ensure that RRSL updates both the decommissioning strategy and facility plans, and addresses the periodicity of conducting future reviews against the Raynesway estate strategy, to ensure it remains current. This will be managed via routine regulatory business.

Emergency Preparedness – Level 1 Emergency Exercise Demonstration

A team of ONR inspectors witnessed RRSL's annual level 1 demonstration emergency exercise 'FOSSA'. In response to the scenario, the site established its emergency organisation promptly and completed a muster of site personnel in a timely manner. Command and control was judged to be good with appropriate focus on protecting the public and site personnel. Emergency response teams successfully recovered and treated a number of casualties. ONR considered that the exercise satisfied the requirements of an adequate demonstration of the implementation of RRSL's emergency arrangements.

2.2 Other 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.

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.

In accordance with site arrangements and regulatory requirements under Licence Condition 7 (Incidents on the site), RRSL have reported two events to ONR in the quarter. ONR inspectors carried out follow up enquiries to gather information and determine if the licensee's response to this event was adequate, and if the incident met ONR's investigation criteria. The significance of the reported events did not meet the ONR investigation criteria. ONR will continue to monitor the adequacy of the RRSL corrective actions as part of routine regulatory business.

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.

- During this period, no LIs, Enforcement Notices or Enforcement letters were issued.

5 NEWS FROM ONR

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.

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

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