

Office for Nuclear Regulation (ONR)

Site Report for HM Naval Base Clyde

Report for period 1 January – 31 May 2021

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

Site inspectors from ONR usually attend Clyde 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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1 Inspections

The majority of sites inspected by ONR are licensed under the Nuclear Installations Act 1965. HM Naval Base Clyde is not a licensed site, although it operates under Authorisation from the Ministry of Defence (MOD) Defence Nuclear Safety Regulator (DNSR). The site comprises the Faslane and Coulport facilities and is regulated by ONR through other legislation as noted below. This report summarises the inspection and regulatory activities associated with HM Naval Base Clyde which are co-ordinated with inspections by DNSR.

Dates of inspection

The ONR Inspectors were on the site on the following dates:

- 8 – 9 March 2021
- 19 -21 April 2021

2 Routine Matters

Inspections

Inspections are undertaken as part of the process for monitoring compliance with:

- 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).

In this period, routine inspections of the HMNB Clyde covered the following:

Inspection for Compliance against the Ionising Radiations Regulations 2017

The intervention consisted of a remote compliance inspection against the Ionising Radiations Regulation 2017 (IRR17) arrangements. The inspection sampled the implementation of arrangements for site radiography and supporting procedures relating to radioactive source management, control and supervision of work, designation of areas and co-operation of employers.

No matters were identified requiring immediate regulatory attention during the inspection. The inspection concluded that there were no significant shortfalls identified against Relevant Good Practice (RGP), with respect to Radiological Protection requirements under IRR17. Some minor shortfalls related to radiation risk assessment for site radiography, local rules and contingency plan rehearsals and planning of such

rehearsals were identified from the inspection and level 4 regulatory issue was raised to capture these minor shortfalls.

Based on the sampling undertaken during the IRR17 remote compliance inspection, ONR concluded that, the duty holders have adequate arrangements for sustained compliance with IRR17 and an inspection rating of Green (no formal action) was awarded.

Other work

In this period a new ONR Nominated Site Inspector has responsibility for HMNB Clyde. In April the inspector undertook a familiarisation visit and walked down key facilities and held discussions with the base personnel. Further regular discussions with the DNSR Inspector have been undertaken to support familiarisation of the regulation of the authorised site.

3 Non-Routine Matters

Duty-holders are required to have arrangements to respond to non-routine matters and events. ONR inspectors judge the adequacy of the duty-holders response, including actions taken to implement any necessary improvements.

No non-routine matters were raised during the period.

4 Regulatory Activity

ONR may issue formal documents to ensure compliance with regulatory requirements.

No LIs, Enforcement Notices or Enforcement letters were issued during this period.

5 News from ONR

Below are summaries of key activities over the last three months. Further detail is available on our website.

Covid-19 (Coronavirus) (ONR position)

- We are continuing to obtain assurance that nuclear site licensees and other dutyholders are adequately resourced to continue to safely and securely carry out their activities. We remain satisfied with industry's response at this time and there has been no significant change to dutyholders' safety and security resilience. As COVID-19 restrictions change, our focus is on the preparedness for the weeks and months ahead and maintaining safe and secure operations. Our latest position can be found on our website.

Enforcement Action

- In January, we agreed to extend two Improvement Notices served on the Atomic Weapons Establishment (AWE), recognising the good progress made so far. The Notices, which were served in June 2019, relate to the way the company controls changes to organisational structure and resources which may affect safety.
- In January, we served an Improvement Notice on Sellafield Ltd following a number of electrical safety incidents across the site. While we are satisfied that Sellafield Ltd is currently meeting the high standards expected with regards to nuclear safety, as a regulator we require sustained improvements in the area of electrical safety.
- In February, we served an Improvement Notice on Morgan Sindall Construction and Infrastructure Ltd after workers came close to striking a live high voltage electric cable during excavation work at the Sellafield site. Nobody was harmed in the incident on 7 October 2020, and there was no impact on the public or the environment. However, the incident posed a serious risk to workers who were operating within one metre of the 11kV cable.

Regulatory Updates

- In March, we published a response on our website to a BBC report relating to Sellafield. We were naturally concerned to hear the claims, particularly any suggestion that staff have been subjected to racist abuse of any kind. As a regulator, if we had any concerns or evidence that bullying and harassment was impacting safety at the site, we would take robust action to ensure this is addressed as a matter of urgency.
- In March, we published an article about how we responded to the serious nuclear accident at the Fukushima Dai-ichi nuclear power plant in 2011 to mark the 10th anniversary.

- In March, we gave EDF permission for Reactors 3 and 4 at Hinkley Point B power station to return to service for a limited period of operation. Permission for Reactor 3 will allow it to operate to a core utilisation of 17.55 terawatt days, while permission for Reactor 4 is to operate to a core utilisation of 17.3 terawatt days, which equates to two periods of approximately six months operation for each reactor.

Stakeholder Engagement

- In February, we encouraged interested parties to take part in a Nuclear Energy Agency (NEA) survey about building and maintaining trust between nuclear safety regulators and the stakeholders they engage with.
- In February, we provided an update about the leadership structural changes we initially announced in December 2020. Under existing contractual arrangements, current Chief Executive Adrienne Kelbie CBE was always expected to step down as her extended term of office comes to an end in January 2022. Mark Foy will step into the new combined role on 1 June 2021, when the new leadership structure will come into full effect.
- In February, we announced that we had appointed Donald Urquhart to the newly-created role of Executive Director of Operations, which will form part of our new leadership structure. As Executive Director of Operations, Donald will be responsible for leading our regulatory work.
- In March, we announced that as part of our new leadership arrangements, we had appointed three new deputy chief nuclear inspectors (DCIs) to our regulatory and senior leadership teams: Jane Bowie, Paul Dicks and Steve Vinton, currently all senior superintending inspectors at ONR. All three new DCIs have a strong track record of delivering regulation across the organisation, and will help us maintain a focus on our Strategy 2020-25.

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

6 Contacts

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