

Office for Nuclear Regulation (ONR)

Site Report for Rosyth Royal Dockyard

Report for period 1 January – 30 June 2021

Foreword

This report is issued as part of our 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 Rosyth Local Liaison Committee and are also available on our website (<http://www.onr.org.uk/llic/>).

Our site inspectors usually attend Rosyth 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 us by emailing contact@onr.gov.uk.

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1 Inspections

Dates of inspection

Our site inspector made inspections on the following dates during the report period 1 January to 30 June 2021:

- 2 February
- 23 February
- 21 – 24 June

2 Routine Matters

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)
- 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 to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and their implementation.

In this period, routine inspections of site covered the following:

Licence Condition (LC) 28 – Examination, inspection, maintenance and testing

This remote inspection consisted of an inspection of the licensee's compliance with Licence Condition 28 (examination, inspection, maintenance and testing). Inspections were undertaken in accordance with our Technical Inspection Guides (TIG) and involved examination of relevant licensee documentation, targeted discussions with relevant members of licensee staff and inspection of equipment in the Active Waste Accumulation Facility and 2 dock area.

The Rosyth Royal Dockyard Limited (RRDL) compliance arrangements for LC28 were found to be adequate on inspection and complied with the relevant ONR guidance. Minor observations were made with regard to the adequacy of: Plant maintenance

schedule completeness; Record keeping; Provision of links to associated LC28 procedures, and; Inclusion of a process for LC28 trending and analysis.

An intervention rating of GREEN (No formal action) on the basis of information provided and evidence obtained during this intervention we concluded that the licensee has made and implemented arrangements which met our required standard under Licence Condition 28 (examination, inspection, maintenance and testing).

Licence Condition (LC) 10 - Training and LC12 – Duly authorised and other suitably qualified and experienced persons

This inspection focussed on the implementation of RRDL arrangements for compliance with Licence Condition (LC) 10 (Training) and LC 12 (Duly authorised and other suitably qualified and experienced persons (SQEP)). This inspection formed part of our Integrated Intervention Strategy for 2021/22.

The inspection purpose was to establish whether RRDL has adequate arrangements for LC 10 and 12 and that their application enabled RRDL to demonstrate that individuals performing safety important roles are SQEP. During the inspection, we gained evidence of how RRDL manage and track the training and competence of individuals whose role is necessary for nuclear safety. In doing this, we considered how the increased risk and complexity associated with the SDP phase 2 may impact the LC 10 and 12 arrangements.

During the inspection we identified several positive aspects. We found that a competency management system was in use and was being kept up to date. We found that individuals who hold roles on the nuclear baseline were able to clearly explain their role and provide confidence that they held suitable competence. However, we also identified several shortfalls, with respect to the arrangements, we found gaps in how roles with nuclear safety importance are identified and reviewed. We also found gaps in the requirement to identify all competencies (knowledge, skills and attitudes) required for role delivery. Based upon the findings we judged that an inspection rating of AMBER (seek improvement) against LC 10 and 12 appropriate.

Other work

L3 regulatory interface forum – Submarine dismantling project (SDP)

We attended the submarine dismantling project (SDP) level 3 regulatory interface forum. The purpose for the meeting was to provide an update to us and other regulators on progress made to current phase 1 (low-level waste) operations and forward look to phase II (intermediate-level waste) operations.

The site presented details of good safety performance reflecting significant hours worked with no loss time accidents. An update on Phase II design progress was provided. This reflected the conclusion of the technical optioneering to inform the

approach which will be undertaken. The L3 RIF provided confidence in the sites ongoing safe delivery of the SDP programme.

Level 2 regulatory interface forum – Post fleet non-operational date (pFNOD)

We attended the pFNOD level 2 regulatory interface forum. The purpose for the meeting was to present ONR and other regulators with updates across the pFNOD programme at Rosyth and Devonport. The meeting was supported by SEPA, DNSR, Babcock and MOD project teams.

Annual Review of Safety

We attended the review of safety for the licensed site. This was supported by a report detailing the safety statistics, challenges, lessons learnt and forward look. It was a comprehensive report and presentation and provided a good opportunity for discussion with the licensee.

3 Non-Routine Matters

Licensees are required to have arrangements to respond to non-routine matters and events. Our 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

We may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, we issue 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 take a range of enforcement actions, to include issuing an Enforcement Notice.

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.

All licensed sites are required to determine minimum staffing levels necessary to ensure safe and secure operations and contingency arrangements in the event that these levels are not met. This condition is specifically designed to ensure that industry can adequately manage and control activities that could impact on nuclear safety and security under all foreseeable circumstances, including pandemics.

Although ONR staff continue to work primarily at home, (carrying out as much of our work as possible via videoconference, phone and email), we are carefully and progressively increasing our site footprint. We continue to assess our on-site presence in line with government guidelines and our business needs, ensuring we have a balanced portfolio of on-site inspections and interventions, that are important to support effective regulation across our purposes. Our latest position can be found on our [website](#).

Enforcement Action

- In April, we announced that EDF [complied](#) with a Direction we served on 14 December 2020, under the Pressure Systems Safety Regulations (2000). This followed an inspection, at which found a number of pressure system components at Heysham 1 Power Station were overdue their scheduled examination.
- In May, we agreed to [extend an improvement notice](#) served on EDF in September 2020, recognising the progress made so far. The notice was served after some of the equipment used to measure reactor power at Heysham 2 was incorrectly configured. We judged that Heysham 2 is able to operate safely, and that additional time to demonstrate the required improvements will not pose a risk to safety. EDF must now comply with the improvement notice by 31 July 2021.
- In June, we announced that Rolls-Royce Submarines Ltd (RRSL) had [complied](#) with an improvement notice served on 29 May 2020. The notice was served after RRSL operators brought 21 units of fissile material into the facility – which exceeding the limit defined within the safety case and set out in the Criticality Control Certificate for the facility.

Stakeholder Engagement

- In April, we published an [article](#) introducing our newest board member, Jean Llewellyn, who joined us in October 2020, as security lead. Jean brings with her a wealth of experience, including serving as a non-executive director on the board of the World Institute for Nuclear Security since 2018 – which has given her a good understating of the global security challenges facing the nuclear industry.
- In May, we issued our e-bulletin '[ONR News](#)' to subscribers. This issue included farewell reflections from our outgoing chief executive, a leadership update, further information on our COVID -19 response, and the results of our latest stakeholder survey. You can sign up for our e-bulletin [here](#)
- On 1 June, we [announced](#) the full implementation of our new leadership structure. Mark Foy is now our combined Chief Executive and Chief Nuclear Inspector. He is supported by Sarah High as Deputy Chief Executive, and Donald Urquhart as Executive Director of Operations.
- In June, we published our new [Corporate Plan for 2021/22](#), which sets out our key priorities to protect the public by securing safe nuclear operations.
- In June, our State System of Accounting for and Control of Nuclear Material (SSAC) project - which saw ONR become the UK's national nuclear safeguards regulator from 31 December 2020, was [shortlisted for a national award](#) in the Project Management Institute's UK National Project Awards in the 'Project of the Year (Public Sector)' category.
- Nuclear safeguards are measures to verify that countries comply with international obligations not to use nuclear materials from civil nuclear programmes for non-peaceful purposes.

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

6 Contacts

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