

Office for Nuclear Regulation (ONR)
Site Report for
Devonport Royal Dockyard Ltd and
HM Naval Base Devonport
Report for period 1 July – 31 December 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 Devonport Local Liaison Committee and are also available on our website (<http://www.onr.org.uk/llic/>).

Our site inspectors usually attend Devonport 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

1.1. Dates of Inspection

ONR inspectors made inspections on the following dates during the report period (July – December 2021):

- 21 July – Licence Condition 35.
- 26 – 28 July – Fire Safety.
- 25 – 27 August – Licence Condition 22.
- 22 – 23 September & 5 – 8 October – Licence Condition 7.
- 30 September – Reactive Follow-up
- 12 October – Civil Engineering.
- 11 November – Radioactive Waste Management
- 9 December – Licence Condition 11.

Some of the inspections were carried out with inspectors from the Ministry of Defence's internal regulatory organisation; the Defence Nuclear Safety Regulator (DNSR) and the Environment Agency Nuclear Regulators.

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 involve 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 site covered the following:

- management of operations including control and supervision;
- modifications to plant, equipment and safety cases;
- emergency preparedness;
- incidents on the site;
- radioactive waste management;
- organisational changes;
- periodic safety review;
- conventional (non-nuclear) health and safety;
- compliance with DRDL's arrangements for COVID-19 social distancing and other related health protection measures.

During the reporting period, we judged the arrangements made and implemented by the site in response to safety requirements to be satisfactory in the areas inspected. Where improvements have been identified, the licensee has made a commitment to address those issues, and our inspectors will closely monitor progress during future site inspections. Where necessary, we will take formal regulatory enforcement action to ensure that appropriate remedial measures are implemented to reasonably practicable timescales.

Members of the public, who would like further information on our inspection activities during the reporting period, can view site Intervention Reports at www.onr.org.uk/intervention-records on our website www.onr.org.uk.

Should you have any queries regarding our inspection activities, please email contact@onr.gov.uk.

2.2. Other Work

SITE DEVELOPMENTS AND FUTURE NUCLEAR FACILITIES

We continue to engage on the project to a number of replacement docking capabilities within the licensed site, including the ability to defuel the Laid-Up Submarines (LUSM), and the need to provide deep maintenance support to current and future submarine classes.

DEVONPORT NUCLEAR SAFETY STRATEGY

We continue to engage with DRDL on the content and timescales for delivery of its Nuclear Safety Improvement Programme (NSIP). We have focused on targeted areas of improvement, as that will enable DRDL to move out of 'enhanced regulatory attention' at the earliest opportunity. The regulatory strategy to return the site to routine regulatory attention is currently under review to take into account the uplift in nuclear capabilities on site to support LUSM defuelling and maintenance of the Astute Class submarine both of which are new to DRDL. The updated strategy is due for publication in 2022.

ENGAGEMENT WITH SAFETY REPRESENTATIVES

Site inspectors held several meetings with safety representatives, to support their function of representing employees and receiving information on matters affecting their health, safety and welfare at work.

INSPECTIONS AT HM NAVAL BASE DEVONPORT

Most sites we inspect are licensed under the Nuclear Installations Act 1965 (as amended). HM Naval Base Devonport is not a licensed site although it operates under Authorisation from the Defence Nuclear Safety Regulator (DNSR). The site is regulated by ONR through the following legislation:

- The Health and Safety at Work etc Act (HSWA) 1974; and
- regulations made under the HSWA (for example the Ionising Radiations Regulations 2017, the Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPiR) and the Management of Health and Safety at Work Regulations 1999).

The demonstration exercise (Licence Condition 11) conducted on 9 December 2021 is joint between DRDL and HM Naval Base Devonport.

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.

Matters and events of note during the period were:

INF1 1264 – 11 Dock Gas Bottles – DACC Stand-Up

An oxygen bottle and an acetylene bottle were identified as being in a poor material state, situated in the middle of 11 Dock bottom and was sentenced as Serious Potential. DRDL declared an onsite incident and managed the response from the Devonport Accident Control Centre (DACC). A 200m exclusion boundary was initially established, this was subsequently reduced to 50m. DRDL vented the oxygen and undertook a controlled burn of the acetylene on the 23 September 2021.

The incident was dealt with in accordance with the licensee's arrangements, which are deemed to be adequate, and we monitored the situation throughout. We undertook regulatory follow-up activities and confirmed that operations at site remained safe.

INF1 1472 – DRDL Nuclear Accident Alarm System Siren – Test Sounder

The licensee reported that the Nuclear Accident Alarm System Siren (NAASS) did not initiate on the weekly routine test. The licensee confirmed that there was a fault in the test sounder and that the actual NAASS remained operable and available.

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.

- The following LIs, Enforcement Notices and Enforcement letters have been issued during the period:

Table 1: Licence Instruments and Enforcement Notices Issued by ONR during this period

Date	Type	Ref No	Description
28/09/21	Enforcement Letter	ONR-EL-21-023	Electricity at Work Regulations 1989

Reports detailing the above regulatory decisions can be found on our website at <http://www.onr.org.uk/pars/>.

5. News from ONR

For the latest news and information from the Office for Nuclear Regulation, please read and subscribe to our regular email newsletter 'ONR News' at

www.onr.org.uk/onrnews

6. Contacts

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