



Diane Wood
Chief Executive
Cumbria County Council
The Courts
Carlisle
CA3 8NA

Jonathan Burgess
Deputy Resilience Manager
Environment and Community Services
Cumbria County Council
Penrith Fire Station
Carleton Avenue
Penrith
CA10 2FA

[REDACTED]
Superintending Inspector (Nuclear Safety)
Emergency Preparedness and Response
Office for Nuclear Regulation
St James House
St James Square
Cheltenham
Gloucestershire
GL50 3PR

Telephone: [REDACTED]

Email: [REDACTED]

Our Reference: 4.10.2.92. (2014/451236)
Unique Number: EPR 2014/218

Date: 10th December 2014

**RADIATION (EMERGENCY PREPAREDNESS AND PUBLIC INFORMATION) REGULATIONS
2001 (REPPIR)**

BARROW OFF-SITE EMERGENCY PLANNING AREA

Dear Mrs Wood and Mr Burgess

As Cumbria County Council is aware, ONR has been re-determining the REPPIR off-site emergency planning area⁽¹⁾ and the area within which prior information is to be supplied to members of the public in relation to the Barrow GB nuclear site and nuclear warship site as prescribed in REPPIR regulations 9(1) and 16(1) respectively.

This process was initiated by Reports of Assessment sent to ONR by BAE Systems Marine Ltd and the Ministry of Defence (MOD), which indicates the lower radiological hazard of a new submarine when compared to that of an operational submarine (as assumed in previous Reports). The reduction in hazard is consequent to an assessment of the site specific activities at Barrow.

This determination takes cognisance of the development and publication of ONR's revised principles for determination⁽²⁾ of such areas.

This letter is to inform Cumbria County Council, as the local authority responsible under REPPIR for the preparation of the off-site emergency plan⁽³⁾ around the Barrow GB nuclear site and nuclear warship site of the following:

1. ONR notes that in accordance with the requirements of REPPIR regulations 5 and 6, BAE Systems Marine Ltd and the MOD have reviewed their respective Hazard Identification and Risk Evaluations for the Barrow GB nuclear site and nuclear warship site and have submitted their Reports of Assessment to ONR.
2. ONR has completed its assessment of these submissions and concluded that these Reports of Assessment satisfy the requirements of regulation 6(4) and Schedule 5 of REPPIR, and that an off-site emergency plan continues to be required in relation to both sites.
3. In accordance with regulation 9(1), ONR has determined the REPPIR off-site emergency planning area around the Barrow GB nuclear site and nuclear warship site as the area within the red line on the map attached to this letter. The area defined by this map may be generally described as: A land area defined by the boundary of the Furness/ Cumbria Coast railway



property and adjacent electoral ward boundaries extending by up to approximately 2 km from the Wet Dock Quay (WDQ) and Ramsden Dock Basin (RDB) on the Barrow side and to the east of the sites by up to approximately 6 km to include the whole of Walney Island; a water area extending along the Walney and Scarf channels to established ABP jurisdiction lines and bounded by the shoreline.

4. ONR is satisfied that there has been a reduction of risk associated with the Barrow nuclear licensed and the MOD authorised sites compared to previous estimates. However, this re-determination represents an effective increase in the size of the REPPiR off-site emergency planning area when compared with the currently defined overlapping circular areas of radius 2 km. This enhanced planning area does not mean that ONR has identified a greater risk for those living near the sites; but recognises the learning that has emerged from global events such as occurred at Fukushima and the need to review the scope of off-site emergency planning.
5. The enhanced planning area reflects the site specific application of ONR's revised principles and related guidance for determination of REPPiR off-site emergency planning areas (which were revised in 2013 and published on the ONR website in January 2014). The area specified differs from the current area with the boundaries now defined by the route of the Furness-Cumbria railway, electoral ward boundaries, and the consideration of adjacent vulnerable communities; where additional off-site emergency planning would be of benefit in protecting the public and restricting exposures so far as is reasonably practicable in the event of a reasonably foreseeable radiation emergency. The changes are part of ONR's continuous improvement process to review emergency planning for the protection of the public in the unlikely event of a radiation emergency.
6. Barrow is the second site where ONR's revised principles have been applied to determine the extent of the off-site emergency planning under REPPiR. The principles will be successively deployed to all other UK nuclear facilities that ONR regulates.
7. In addition to arrangements under REPPiR, BAE Systems Marine Ltd is required to make and implement adequate arrangements under the site licence conditions attached to its nuclear site licence for dealing with any accident or emergency arising on the site and their effects⁽⁴⁾. (Note that the MOD nuclear warship site is not regulated by ONR in this respect.)
8. As a result of this re-determination, and in accordance with REPPiR regulation 9(8), the Council is required to produce a revised off-site emergency plan within six months (or such longer period as the ONR may agree in writing)⁽⁵⁾ either from whichever is the later of the date of receipt of this letter, or from the receipt of such information from the operator as is necessary for the purposes of the preparation of such an off-site plan. The revised plan must apply to the area defined in paragraph 3 above.
9. In accordance with regulation 16(1), ONR has also re-determined the area within which the operators must supply prior information under REPPiR to be the same area as identified within the red line on the map attached to this letter. The operators have the legal duty to provide such specified information in this area, and a copy of the letter advising them of this is also attached.

Yours sincerely,


Superintending Inspector (Nuclear Safety)



(1) The Barrow REPPiR off-site emergency planning area is the area for which Cumbria County Council is required, under REPPiR regulation 9(1), to produce an off-site emergency plan for the protection of persons who are, or potentially may be, located in this area in the event of a radiation emergency. The plans will include public information and a range of countermeasures and other protection measures relevant and proportionate to the radiological hazards associated with the Barrow GB nuclear site and nuclear warship site at appropriate locations within all or part of this area. In developing the REPPiR off-site emergency plan, the local authority is required to consult a range of persons including the operators, ONR, the emergency services, the relevant health authority, and such other persons, bodies and authorities and members of the public as it considers appropriate.

(2) ONR's revised principles for determination of REPPiR off-site emergency planning areas can be found at: <http://www.onr.org.uk/depz-onr-principles.htm>

(3) The REPPiR off-site emergency planning area referred to in this letter is identified as the 'Detailed Emergency Planning Zone' (DEPZ) and comprises two overlapping circular areas of radii 2 km in the Council's current BAE Off-site Emergency Plan for Barrow.

(4) The operator's on-site plan and their contribution to the off-site plan (eg. assistance with urgent countermeasures), and the off-site emergency plan put in place by the local authority, would be complimented by wider food restrictions as determined by the Food Standards Agency in accordance with the Food and Environment Protection Act, 1985.

(5) REPPiR regulation 9(8) allows ONR, at the request of the Council, to agree in writing a longer time period for revision in exceptional circumstances.

Map: Barrow REPIR Regulations 9(1) and 16(1) Off-site Emergency Planning and Off-site prior information areas from 10 December 2014

The area defined by this map may be generally described as:

A land area defined by the boundary of the Furness/ Cumbria Coast railway property and adjacent electoral ward boundaries extending by up to approximately 2 km from the WDC and RDB on the Barrow side and to the east of the sites by up to approximately 6 km to include the whole of Walney Island; a water area extending along the Walney and Scarf channels to established ABP jurisdiction lines and bounded by the shoreline.

