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RADIATION (EMERGENCY PREPAREDNESS AND PUBLIC INFORMATION) REGULATIONS 2001 (REPPiR) – HMNB CLYDE (RNAD COULPORT) OFF-SITE EMERGENCY PLANNING AREA

Dear Mr Sneddon and Ms Keeley,

As you are 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 HMNB Clyde (RNAD Coulpport) DNSR Authorised Site as prescribed in REPPiR regulations 9(1) and 16(1) respectively.

Under regulation 5(2), and on behalf of the Ministry of Defence (MOD), Naval Base Commander (Clyde) (NBC) has reviewed and assessed the risks from its naval submarine reactor plant and has made a declaration to ONR that there is no change to the circumstances that might affect its Report of Assessment (RoA) and risks resulting from activities at HMNB Clyde (RNAD Coulpport) DNSR Authorised Site.

Our re-determination is made in accordance with ONR's principles and guidance for determination⁽²⁾ of such areas, and this letter is to inform Argyll and Bute Council, as the lead local authority responsible under REPPiR for the preparation of the off-site emergency plan⁽³⁾ around the HMNB Clyde (RNAD Coulpport) DNSR Authorised Site, of the following:

1. ONR notes that, in accordance with the requirements of regulations 5 and 6, NBC has reviewed its Hazard Identification and Risk Evaluation (HIRE) for the naval submarine reactor plant, and has submitted a declaration of no change to the circumstances that might affect its RoA.
2. ONR has completed its assessment of the NBC submission and concluded that it satisfies the requirements of regulation 5(2), and that an off-site emergency plan continues to be required.
3. In accordance with regulation 9(1), ONR has determined the off-site emergency planning area around HMNB Clyde (RNAD Coulpport) DNSR Authorised Site as the area contained within the red line on the map attached to this letter, which may be generally described as:
 - *An area extending to a radial distance of 1.5 km from the centre point of the Explosives Handling Jetty at the HM Naval Base Clyde - Royal Naval Armaments Depot Coulpport.*



4. The planning area reflects the site specific application of ONR's principles and related guidance for determination of REPIR off-site emergency planning areas (which are published on ONR's website), and consideration of the existing off-site emergency planning area to extend it beyond the minimum required circular area to further enhance public protection. The area is now defined by geographical features and the consideration of adjacent vulnerable communities. This represents the area within which 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.
5. In addition to arrangements made under REPIR, the MOD's DNSR requires under formal Authorisation Conditions (that are closely aligned with ONR Licence Conditions) adequate arrangements for dealing with any accident or emergency arising at HMNB Clyde (RNAD Coulport) and their effects⁽⁴⁾, these arrangements are implemented by NBC on behalf of the MOD.
6. As a result of this re-determination, and in accordance with 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 areas defined in paragraph 3 above.
7. In accordance with regulation 16(1), ONR has also re-determined the area within which the operator must supply prior information to be the same area as identified within the red line on the map attached to this letter. NBC has 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

[Redacted signature block]

Referenced Explanatory Notes:

(1) The HMNB Clyde (RNAD Coulport) DNSR Authorised Site REPPIR off-site emergency planning area is the area for which Argyll and Bute Council as the lead local authority, 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 berthed or anchored nuclear powered submarine 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 principles for determination of REPPIR off-site emergency planning areas can be found at: <http://www.onr.org.uk/depz-onr-principles.htm>

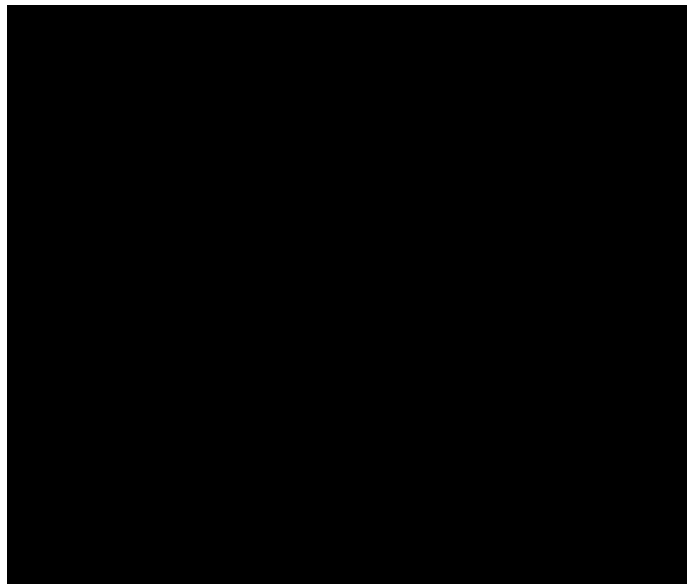
(3) The REPPIR off-site emergency planning area referred to in this letter is identified as the 'Detailed Emergency Planning Zone' (DEPZ) and comprises of a minimum radial distance of 1.5 km from the Explosives Handling Jetty in the Council's current Clyde Off Site Emergency Plan for the site.

(4) The operator's on-site plan and its 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 complemented 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.

Distribution

HMNB Clyde on behalf of MOD
Navy Command
Defence Nuclear Safety Regulator
Queens Harbour Master Clyde
Maritime and Coastguard Agency:
Environment Agency
Scottish Environmental Protection Agency
Food Standards Agency
Food Standards Scotland
Department for Business, Energy and Industrial
Strategy
Scottish Government
ONR



Attachment to Un. Letter No NSS70178, dated 28th February 2017. Map of HMNB Clyde (RNAD Coulport) REPIR regulations 9(1) and 16(1) off-site emergency planning and off site prior Information areas.

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

An area extending to a radial distance of 1.5 km from the centre point of the Explosives Handling Jetty at the HM Naval Base Clyde - Royal Naval Armaments Depot Coulport.

