

From: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]
Subject: feedback from REPPiR 2019 review of OSEP
Date: 05 August 2021 10:43:00

Dear [REDACTED]

I already provided some verbal feedback about my recent review of the AWE off-site emergency plan. Please find below the summary of findings. The scope of the assessment was limited to the mandatory content of the off-site emergency plan as specified in Regulation 11(3), and taking account of the ACoP and guidance where relevant. The complexity and size of the two AWE DEPZs with their densely populated (at least compared to other DEPZs) and transient populations, means that further assurance of the implementation of arrangements is needed (for example in testing etc.). I have also made some observations where the plan didn't make sense to me, or where it raised a question.

Overall the plan appears to be comprehensive and compliant in the most part with the relevant requirements of REPPiR. Please can I ask that you consider the observations below and let me know if you think I have misunderstood or missed any information. If you are agreed with the observations, please can you consider amending the plan accordingly in line with your routine business.

Areas of good practice

- The plan is set out well and it is easy to find the relevant information.
- Many of the issues /concerns and key considerations for these are detailed. For example, table 3.6.2 provides a list of key actions and who would be required to take them forward and at which point. 3.9.4 details which organisations would provide what information and by when. The table at 3.10 describes the initial advice /considerations for a wide range of issues.
- Section 7.5 covers contamination within rest centres, contaminated pets, media intrusion etc. There is considerable consideration of vulnerable people.
- There is a considerable amount of detail in how decontamination of people will be carried out. Although locations of decontamination units aren't provided, considerations for their location are alongside considerations for how people would be informed, which organisations are responsible and the facilities are described in section 7.3.
- Hyperlinks to other relevant plans are included.

Area for Improvement

- Due to the significant recent increase in DEPZ size around Burghfield and the complicated and highly populated nature of both DEPZs, the plan will significantly benefit from scrutiny and testing of its individual elements. This will provide assurance that the plan is implementable, or where improvements are needed.
- 5.3 describes the limitations of the AWE telephony system i.e. it is an opt- out system that relies upon landlines. This will be supported by warning and informing through media outlets. There is a question over the reach and also how people would be informed at night time. The use of loud hailers which 'may be employed' is mentioned but it would be useful to understand on what basis and who/how this decision would be made.
- The use of the term - UPA which stands for urgent protective action (distance/zone) is confusing. The DEPZ defines the area in which urgent protective actions are needed – it is important that all of the DEPZ is afforded

protection for a variety of reasons: not to bisect communities, to ensure vulnerable groups are catered for, for ease of communication, to ensure egress/ingress/through routes issues are considered etc.

- Perceived risks are mentioned within the plan but not specifically how the communications will be managed around these. This information may be contained elsewhere in which case this should be referenced.
- I could not find within the plan, in respect of the DEPZ, setting out of (i) the severity of consequences in terms of dose quantity, and (ii) the extent to which the consequences can be mitigated by timely action [REPPiR Sch 6 Part 2 Ch 3(5)(b)]. It is noted that this information is available in the AWE Consequences Reports.

Other observations

1. Should 5.6.4 reference and link be to table at section 3.10?
2. For the on-site AWE Fire & Rescue Services, the emergency exposure levels are given in 7.7.8. The OSEP states that deployment is only after dis-application of the dose limits prescribed in the IRRs by the AWE Emergency Manager, guidance from Health Physics and authorisation by a senior AWE FRS Officer for doses > 20mSv. However disapplication via IRR is not relevant here as REPPiR reg 19 provides for the disapplication of dose limits where necessary to respond to a radiation emergency or prevent the occurrence of a radiation emergency.
3. Also in 7.7.8 the emergency exposures for AWE personnel are provided. Are these necessary for the off-site plan or better in the on-site plan?
4. The OSEP describes the purpose of reference levels at 7.7.9. It describes how the STAC will continue to reassess doses and compare with reference levels. The plan in general describes the protective actions although these are not related to the reference levels. There are no reference levels given for the emergency phase for any groups (responders or MoP).
5. Para 6.4 sentence doesn't make sense. Also is PHE responsible for guidance or is that the STAC's role?
6. Consider linking section 2.9 which describes the magnitude of the hazard to the basis of the DEPZ/UPA described in 8.2?
7. Page 144 section 8.3 second paragraph states *The OPZ operates at distances beyond the DEPZ, but can also be undertaken in the DEPZ*. Not clear what this last part of the sentence means
8. Typo – 'altering' table 6.5.1 p72, first row.

Kind regards

[Redacted]



[Redacted]

ONR Inspector – Emergency Preparedness & Response

[Redacted]

