



**Office for Nuclear Regulation (ONR)
Site Report for
Devonport Royal Dockyard
(Devonport Royal Dockyard Ltd and
HM Naval Base Devonport)**

Report for period 1 January to 30 June 2020

Foreword

This report is issued as part of ONR's 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 the ONR website (<http://www.onr.org.uk/llic/>).

Site inspectors from ONR 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

The ONR site inspectors made inspections on the following dates during the period:

- 14 - 16 January.
- 23 January.
- 12 February.
- 18 - 22 February.
- 8 June.

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

2 ROUTINE MATTERS

2.1 Inspections

Inspections are undertaken as part of the process for checking compliance with:

- the conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
- the provisions of 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 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. Inspectors seek to judge both the adequacy of these arrangements and their implementation.

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

- Operating Rules and Operating Instructions
- Safety mechanisms, devices and circuits;
- Examination, inspection, maintenance and testing;
- Training;
- Duly Authorised and other suitably qualified and experienced persons;
- Control and Supervision of operations;
- Accumulation of radioactive waste;
- Leakage and escape of radioactive material and radioactive waste;
- Annual Review of Safety;
- DRDL Board arrangements;
- Emergency Arrangements.

Additionally, an ONR Site Inspector undertook an assessment of the adequacy of DRDL's arrangements for compliance with COVID-19 social distancing and other health protection measures, and inspected the adequacy of the implementation of these measures on site.

In general, ONR judged the arrangements made and implemented by the site in response to safety requirements to be adequate in the areas inspected. Where improvements were considered necessary, the licensee made commitments to address the issues, and the inspectors will monitor progress during future visits. If necessary, ONR will take formal regulatory enforcement action to ensure that appropriate remedial measures are implemented to reasonably practicable timescales.

The following sections provide an update on items previously covered in ONR's site reports, and relevant new information.

SITE DEVELOPMENTS AND FUTURE NUCLEAR FACILITIES

ONR continues to engage on the project to provide a new defueling capability in the Submarine Refit Complex (SRC), known as 'Future Nuclear Facilities'. This will enable final defueling of Laid-Up Submarines (LUSM). ONR is regulating the new Reactor Access House (RAH) project through agreed regulatory hold points, and through DRDL's compliance with its arrangements for modification to the design of plant during construction (LC20) and commissioning (LC21).

ONR continues to engage with DRDL on 'Future Docking Facilities'. This work is focused on ensuring that the dockyard has sufficient capacity and facilities to deliver the longer term submarine programme safely.

DEVONPORT NUCLEAR SAFETY STRATEGY

ONR continues to engage with DRDL on the content and time-scales for delivery of its Nuclear Safety Improvement Programme. ONR has developed a regulatory strategy which enhances the regulatory presence on the site, and focuses on targeted areas to enable DRDL to move out of 'enhanced regulatory attention' at the earliest opportunity. ONR's level of confidence that the regulatory strategy remains fit for purpose and will secure a timely return towards routine regulatory attention is high. Significant progress has been made over the last year and the improvements are resulting in tangible benefits across the Devonport licensed site.

SYSTEM BASED INSPECTION (SBI) - VESSEL IMPACT - EXTERNAL DROPPED LOAD

ONR carried out a planned system based inspection targeting the systems and arrangements which prevent an external impact to a vessel in 9 Dock in excess of the design withstand of the reactor systems. The ONR inspectors sampled the dockside crane zoning system, hard wired height limit system and lifting operation arrangements to confirm the adequacy of implementation of the licensee's safety case. From the evidence gathered during this SBI, the ONR inspection team judged that the vessel impact protection systems and arrangements meet the requirements of the safety case, and their implementation is deemed adequate

THEMED INSPECTION - LICENCE CONDITIONS 10, 12 AND 26

ONR inspectors carried out a planned themed compliance inspection within 9 Dock to assess DRDL's responsibility, authority and accountability improvement activities against relevant good practice, comprising licence condition(s) (LC) 10 (training), 12 (duly authorised and other suitably qualified and experienced persons) and 26 (control and supervision of operations). The focus of this inspection was to ensure that the roles, responsibilities, accountabilities and performance standards required for safety are clear, and that personnel with responsibilities for safety are competent and have authority and access to appropriate resources to allow them to discharge these responsibilities effectively. The ONR inspection team judged that the arrangements for LC 10, 12 and 26 are adequate, based on the aspects sampled for this compliance inspection. DRDL's arrangements for control of work were judged to have been effectively implemented in relation to activities being undertaken at the time of inspection.

LICENCE CONDITION 32 - ACCUMULATION OF RADIOACTIVE WASTE LICENCE CONDITION 34 – LEAKAGE AND ESCAPE OF RADIOACTIVE MATERIAL AND RADIOACTIVE WASTE

An ONR Inspector conducted a Licence Condition inspection to consider the adequacy of the improvements to the licensee's arrangements made under Licence Condition (LC) 32 and LC 34, since the previous compliance inspection in 2017. On the basis of the evidence sampled against the regulatory expectations of LC 32, the licensee demonstrated it is progressing with improvements to address the shortfalls within its compliance arrangements. The regulatory issue will remain open to ensure regulatory oversight of the remaining improvements required. On the basis of the evidence sampled against the regulatory expectations of LC 34, the licensee has made adequate improvements to their LC34 compliance arrangements.

LICENCE CONDITION 11 - EMERGENCY ARRANGEMENTS

ONR inspectors conducted a compliance Inspection to assess the adequacy of DRDL's arrangements for LC11 (Emergency Arrangements). The focus of the inspection was the arguments and evidence presented in response to ONR's Emergency Response Capability Map requirements. It was judged that the Licensee's arrangements for LC11 are adequate and that the licensee has robust arrangements across all of the outcomes identified within the capability map process.

DRDL BOARD ARRANGEMENTS AND CONDUCT OF THE DRDL BOARD

ONR inspectors conducted an intervention to observe the DRDL Board, examine DRDL's Board arrangements, conduct structured interviews with selected Executive and Non-Executive Directors and to assess the application of relevant good practice. On the basis of the areas sampled during the intervention, the inspectors judged that DRDL had established adequate arrangements for the DRDL Board and Executive. There was evidence that the licensee has made significant improvements in the arrangements, challenge culture and behaviours of the DRDL Board over the last 12 months. This work has also included appropriate separation of Board and Executive functions, as described in relevant good practice

LC26 – CONTROL AND SUPERVISION OF OPERATIONS

An ONR inspector undertook a Licence Condition (LC) 26 Compliance Inspection within 9 Dock to assess DRDL's implementation of control and supervision against relevant good practice (RGP). The inspection was also used to undertake an assessment of the adequacy of DRDL's arrangements for compliance with COVID-19 social distancing and other health protection measures, and the implementation of these measures on site. It was judged that DRDL's arrangements for control and supervision of work had been effectively implemented in relation to the activities being undertaken at the time of inspection. There are clear control arrangements in place to ensure that the licensee is in day-to-day control of operations on the site, and that there are sufficient SQEP personnel to ensure that these activities can be supervised effectively. DRDL's arrangements were judged to be in compliance with current government guidance in relation to working safely during COVID-19 in factories, plants and warehouses and the arrangements were judged to be effectively implemented.

ANNUAL REVIEW OF SAFETY

ONR attended the Annual Review of Safety meeting that provided the opportunity to carry out a stand-back review of the site's performance during the previous year. The meeting was considered to be well run, reviewing the extent to which commitments made at the previous Annual Review had been met; and providing a strategic forward look over the next year.

ENGAGEMENT WITH SAFETY REPRESENTATIVES

The site inspection team held periodic 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

The majority of sites inspected by ONR 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).

There were no inspections undertaken by ONR during the period.

3 NON-ROUTINE MATTERS

Licensees are required to have arrangements to respond to non-routine matters and events. ONR inspectors judge the adequacy of the licensee's response, including actions taken to implement any necessary improvements.

INCIDENTS ON THE SITE

In accordance with site arrangements and regulatory requirements under Licence Condition 7 (Incidents on the site), DRDL have reported a number of events to ONR in the quarter. ONR inspectors have carried out follow up enquires to gather information, to determine if the licensee's response to these events was adequate and to determine if the incident met ONR's investigation criteria. ONR will monitor the efficiency of the DRDL corrective actions as part of normal regulatory business.

An incident has been reported to ONR where maintenance was not carried out within the period specified in the plant maintenance schedule. This was a repeat event and ONR has subsequently written a formal enforcement letter requiring the licensee to make improvements in arrangements to ensure that every examination, inspection, maintenance and test of a plant is carried out within the intervals specified in the plant maintenance schedule. Additionally, a Holding to Account Meeting was held to make clear to dutyholder management that the enforcement action being taken was the baseline enforcement level and is subject to escalation if required improvements are not delivered.

4 REGULATORY ACTIVITY

ONR may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, ONR issues 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 issue Enforcement Notices to secure improvements to safety.

- No LIs or Enforcement Notices were issued during the period.

5 NEWS FROM ONR

Covid – 19

ONR is continuing to protect society by securing safe nuclear operations during the Covid-19 (coronavirus) pandemic. Our staff continue to work from home, in line with government advice, with a limited number of our inspectors, as key workers, travelling to site as necessary to conduct urgent and essential regulatory inspections. ONR's latest position can be found on our [website](#).

Enforcement Action

ONR announced in February that Sellafield Limited had complied with an Improvement Notice relating to staff training, operating procedures and procedural adherence that they were served with in May 2019.

ONR served an [Improvement Notice on EDF Energy Nuclear Generation Ltd \(EDF Energy\)](#) for contravention of the Pressure Systems Safety Regulations (2000) at Heysham 1 Power Station. The notice was served after shortfalls were discovered in the examination and inspection of the Reactor 1 pressure vessel at the Lancashire plant. EDF Energy must comply with the Improvement Notice and complete the eleven overdue examinations by 18 December, 2020.

ONR has granted an extension to an [Enforcement Notice served on Urenco UK Ltd](#), recognising the good progress made so far. The notice was issued in late December 2019, following a fire safety inspection at the Capenhurst Works in Cheshire, which revealed shortfalls in the fire alarm and detection systems at one of the site's facilities. Urenco UK Ltd must comply with the requirements of the extended notice by 30 September, 2020.

Regulatory Updates.

In January ONR published an update to its Safety Assessment Principles, to incorporate some relatively minor revisions including typographical corrections and updates to reflect changes to the UK's nuclear regulatory framework since 2014.

In February ONR completed Step 3 of the Generic Design Assessment (GDA) of the UK HPR1000 design, and took the decision to progress to Step 4 of the GDA. During Step 3, ONR increased its regulatory scrutiny and undertook a more detailed assessment of the design, focusing on the methods and approaches used by the GDA Requesting Party to underpin their safety and security claims.

In March we published the Quarterly Statement of Civil Incidents for the period 1 October to 31 December 2019. During this reporting period there were two civil incidents at nuclear licensed sites within Great Britain that met the Ministerial Reporting Criteria as defined within the Nuclear Installations (Dangerous Occurrences) Regulations 1965 and ONR guidance in relation to notifying and reporting incidents and events.

In June ONR received an application for a nuclear site licence from NNB Generation Company (SZC) Limited, to construct and operate two EPR TM reactors, at its proposed development in Sizewell, Suffolk. We will now assess the application, partly informed by our previous assessment of the EPR TM at Hinkley Point C – including using the relevant lessons from that assessment, while focusing on aspects specifically relevant to Sizewell C.

Whilst we are satisfied that the application is sufficiently complete to proceed to assessment stage, there is still a lot of work to do – and we do not expect to reach a decision, until at least the end of 2021.

6 CONTACTS

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Published 08/20

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