



Office for Nuclear Regulation (ONR)
Site Report for
Rolls-Royce Submarines Limited (RRSL) Raynesway,
Derby
Nuclear Fuel Production Plant (NFPP) and Neptune
Reactor Licensed Sites

Report for period 1 April – 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 Rolls Royce Submarines Limited Local Liaison Committee (LLC) and are also available on the ONR website (<http://www.onr.org.uk/llc/>).

Site inspectors from ONR usually attend Rolls Royce Submarines Limited LLC meetings where these reports are presented and will respond to any questions raised there. On this occasion this is not possible due to the COVID 19 restrictions being in place. However, any person wishing to enquire about matters covered by this report should contact ONR.

TABLE OF CONTENTS

1	INSPECTIONS	3
2	ROUTINE MATTERS.....	3
3	NON-ROUTINE MATTERS.....	5
4	REGULATORY ACTIVITY	5
5	NEWS FROM ONR APRIL-JUNE 2020 (Q2)	5

1 INSPECTIONS

1.1 Dates of inspection

The ONR inspectors have not visited the site during this period due to COVID-19 restrictions; however, remote engagements with RRSL have continued and took place on the following dates:

- 23, 24 and 29 April.
- 12-13 May.
- 9-10 June.

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 entail monitoring the 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 at RRSL covered the following:

- Major infrastructure projects review.
- Licence condition compliance.
- Radioactive waste management.
- Neptune reactor upgrade.
- Regulatory issues review.

Review of Safety

The ONR inspector noted that:

Over the period, no events occurred that met the reporting requirements of the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

During the period, a shortfall in safety performance occurred on the NFPP site. There was no risk to the workers or the public as a result of the event and no risk of any radiological consequences. However, ONR is considering what regulatory enforcement action may be necessary to ensure that RRSL reduces the risk of a recurrence of the event to as low as reasonably practical.

ONR attended the Annual Review of Safety (ARoS) level 2 meeting on 29 April. ONR provided feedback to RRSL that in some cases, the review did not meet ONR's expectations set out in

its guidance. RRSL agreed to address the shortfalls identified by ONR in subsequent ARoS meetings.

ONR is continuing to engage with RRSL on the impending changes to its company structure.

LLC

The nominated ONR site inspector provided a report to RRSL for remote distribution to the LLC.

Major Infrastructure Projects Review

The nominated ONR site inspector has kept the major infrastructure projects under review and ONR's project inspector has improved the working level engagement with the ongoing infrastructure projects. ONR will continue to monitor the implementation of RRSL's improvement plan through regular site meetings, and the major infrastructure projects' progress against the integrated management plan; part of the deliverables of RRSL's improvement plan.

RRSL has begun its engagement with ONR on the next phase of the Raynesway site regeneration programme.

Licence Condition Compliance

As a result of the restrictions posed by COVID-19, the LC4 and LC5 inspection planned for April has been deferred.

The ONR site inspector engaged remotely with site on 12-13 May to carry out a LC7 compliance inspection. ONR inspectors sampled evidence of the licensee's compliance with its arrangements for the notification, recording, investigation and reporting of incidents on site, and judged that, on the evidence sampled, RRSL still has significant shortfalls in its arrangements, particularly in its investigation of incidents.

ONR concluded that RRSL's LC7 arrangements and their implementation do not meet ONR's expectations set out in its guidance documentation. ONR will follow up the close out of the shortfall as part of its normal regulatory business.

ONR inspectors engaged remotely with site on 9-10 June to carry out a LC17 compliance inspection. ONR inspectors sampled evidence of the licensee's management systems to ensure that they give due priority to safety.

ONR judged that relevant good practice was generally met. However, some minor shortfalls were identified, when compared with ONR's guidance. One specific area for improvement requires attention from the licensee and ONR raised a level 4 regulatory issue to ensure a timely response from RRSL to address this.

Overall, on balance, ONR judged that the management systems do give due priority to safety.

Radioactive Waste Management

ONR is content with the progress made in this area but will continue to monitor the delivery and implementation of RRSL's improvement plan using ONR's regulatory issues process. An Ionizing Radiation Regulations 2017 (IRR17) Level 4 meeting and the Level 4 radioactive waste management meeting were held in the period.

Neptune Reactor Upgrade

ONR inspectors engaged with RRSL to resolve a regulatory query which has now been closed. Further RRSL submissions have been received for the installation of some of the early procurement items. The first of these has been permissioned. ONR continues to monitor the safety case development programme via weekly teleconference meetings.

ONR will continue to use its regulatory query process for tracking the Neptune reactor upgrade issues.

Regulatory Issue Review

A regulatory issues review was conducted during the May and June inspection periods. ONR is satisfied with the progress that RRSL is making to address the extant issues.

Other work

Throughout this period, there were a number of meetings and telephone engagements with RRSL, to discuss regulatory matters related to safety, facility construction and refurbishment on site.

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.

The RRSL safety improvement plan (SIP) put in place following the stand down on site last year has proved ineffective in preventing further events on the NFPP site. ONR will monitor the delivery of the RRSL SIP, but has decided that further regulatory enforcement is necessary in order to ensure that RRSL prevents recurrence of these events.

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 and Letters to secure improvements to safety.

- During this period, no regulatory enforcement was issued.

5 NEWS FROM ONR APRIL-JUNE 2020 (Q2)

Below are summaries of key activities over the last three months. Further detail is available on [our website](#).

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 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

ONR received an application for a nuclear site licence from NNB Generation Company (SZC) Limited, to construct and operate two EPR™ reactors, at its proposed development in Sizewell, Suffolk. We will now assess the application, partly informed by our previous assessment of the EPR™ 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.

All our latest news is available on our website www.onr.org.uk.

6. CONTACTS

Office for Nuclear Regulation
Redgrave Court
Merton Road
Bootle
Merseyside
L20 7HS

website: www.onr.org.uk
email: Contact@onr.gov.uk

This document is issued by the Office for Nuclear Regulation (ONR). For further information about ONR, or to report inconsistencies or inaccuracies in this publication please visit <http://www.onr.org.uk/feedback.htm>.

© Office for Nuclear Regulation, [2020]

If you wish to reuse this information visit www.onr.org.uk/copyright.htm for details.

Published 8/20

For published documents, the electronic copy on the ONR website remains the most current publicly available version and copying or printing renders this document uncontrolled.