



Office for Nuclear Regulation (ONR) Site Report for Rosyth Royal Dockyard

Report for period 1 January – 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 Rosyth Local Liaison Committee and are also available on the ONR website (<http://www.onr.org.uk/lc/>).

Site inspectors from ONR usually attend Rosyth 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 inspector made inspections on the following dates during the report period 1 January to 30 June 2020:

- 14 – 16 January 2020
- 3 – 4 March 2020
- 14 May 2020

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 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 of site covered the following:

Licence Condition 4 (Restrictions on nuclear matter on site), 5 (Consignment of nuclear matter), 10 (Training) & 12 (Duly authorised and other suitably qualified and experienced persons) Compliance Inspection:

In January 2020, ONR undertook an inspection of RRDLs arrangements and procedures for the receipt, storage and consignment of nuclear matter across the licenced site. The scope of the inspection also included the licensee's arrangements to ensure that only suitably qualified and experience persons conduct receipt, storage and consignment of nuclear matter, and the associated training programme.

Whilst a number of observations were raised, ONR did not judge these to adversely impact on safe operations on the licensed site. The observations represent opportunities for the licensee to improve arrangements as part of its preparation for the next phase of submarine dismantling operations.

Based on the inspection undertaken, a regulatory rating of Green – Adequate – was considered appropriate for Licence Conditions 4, 5, 10 & 12.

Ionising Radiations Regulations, 2017 (IRR'17) Inspection:

In May, ONR undertook a remote inspection of the arrangements for compliance with Ionising Radiations Regulations 2017 (IRR17). The inspection focused on activities on-board the Laid-Up Submarines (LUSMs), berthed within the non-tidal basin at the Rosyth Royal Dockyard. The non-tidal basin is not part of the licenced site. Nuclear operations are conducted under the control of the HM Naval Base Clyde authorisation.

The inspection was carried out remotely due to the on-going restrictions associated with the COVID-19 pandemic.

Based on the limited sample undertaken during the remote IRR17 compliance inspection, ONR was satisfied that adequate arrangements are in place to control activities involving work with ionising radiations on LUSMs in the Rosyth non-tidal basin. The rating for this limited remote inspection is 'Green'.

2.2 Other work

Level 2 Regulatory Interface Forum:

ONR attended the submarine dismantling project (SDP) level 2 regulatory interface forum. The purpose for the meeting was to discuss progress and future plans for the project and wider site.

MOD provided updates on the submarine dismantling project and wider factors, considered as part of the long term post-operational berthing programme. ONR welcomed the decision by MOD to undertake a strategic review of the options available to deliver this work. ONR considers this an appropriate decision given the length of time that has passed since the public consultation.

Engagement with Blue Light Services on Emergency Arrangement:

ONR attended a meeting with RRDL and representatives of the blue light services (Police Scotland, Scottish Fire Service and Scottish Ambulance Service). The meeting was arranged by RRDL to discuss opportunities for improvement following the RRDL demonstration of its emergency arrangements carried out in September 2019.

ONR judged the September emergency exercise was an adequate demonstration of the site responses. The high volume of blue light services that attended site did however raise opportunities for improvement, specifically relating to the coordination of blue light services as they arrive on site. The meeting identified improvements to how the site engages with the blue light services in terms of planning and implementing emergency responses.

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.

There were no such matters or events of significance during the period.

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 take a range of enforcement actions, to include issuing an Enforcement Notice.

No LIs, Enforcement Notices or Enforcement letters were issued during this period.

Table 1
Licence Instruments and Enforcement Notices Issued by ONR during this period

Date	Type	Ref No	Description

Reports detailing the above regulatory decisions can be found on the ONR website at <http://www.onr.org.uk/pars/>.

5 NEWS FROM ONR

5.1 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.

5.2 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 201.

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.

5.3 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.

5.4 Stakeholder Engagement

On 15 January ONR launched a four-week public consultation on its draft 2025 Strategy. Once agreed, the strategy will set our direction and priorities for the next five years. To support the public consultation we held a webinar for NGOs and other stakeholders in which our Chief Executive, Adrienne Kelbie, and Technical Director, Anthony Hart, gave an overview of the strategy and welcomed questions and comments. The strategy is due to be published shortly.

- In January, ONR achieved Level 3 Disability Confident (Leader) status, recognising our desire to put people first and create an environment in which everyone can thrive. The government-backed scheme encourages employers to think differently about disability and take action to improve how they recruit, retain and develop disabled people.
- In February, we announced the appointment of two new members to the ONR Board. Dr Janet Wilson took up the appointment on 1 April 2020 and Tracey Matthews on 1 June 2020 – both appointments are for five year terms.
- In February more than 70 stakeholders involved in the transport of radioactive material attended a conference organised by ONR's Transport Competent Authority (TCA) team. The event provided a good opportunity for the TCA team to share their expectations on compliance with regulations governing the transport of radioactive material.

6 CONTACTS

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