



Office for Nuclear Regulation (ONR) Site Report for HM Naval Base Clyde

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 Clyde Local Liaison Committee and are also available on the ONR website (<http://www.onr.org.uk/lc/>).

Site inspectors from ONR usually attend Clyde 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

The majority of sites inspected by ONR are licensed under the Nuclear Installations Act 1965. HM Naval Base Clyde is not a licensed site, although it operates under Authorisation from the Ministry of Defence (MOD) Defence Nuclear Safety Regulator (DNSR). The site comprises the Faslane and Coulport facilities and is regulated by ONR through other legislation as noted below. This report summarises the inspection and regulatory activities associated with HM Naval Base Clyde which are co-ordinated with inspections by DNSR.

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:

- 15 May 2020.
- 24 June 2020.

2 ROUTINE MATTERS

2.1 Inspections

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

- 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).

Ionising Radiations Regulations, 2017:

In May, ONR undertook a remote inspection of arrangements in place for the compliance with the Ionising Radiations Regulations 2017. The inspection was undertaken remotely due to the restrictions imposed by the COVID-19 pandemic, and focused on the laid up submarines berthed in the non-tidal basin at Rosyth Royal Dockyard. The non-tidal basin is not licenced, and comes under the HM Naval Base Clyde authorisation.

Based on the sampling undertaken during the remote compliance inspection, ONR was satisfied that adequate arrangements are in place to control activities involving work with ionising radiations on-board laid-up submarines berthed in the non-tidal basin. An inspection rating of 'green - adequate' was given.

2.2 Other work

Level 2 Regulatory Interface Forum:

ONR attended (remotely) the level 2 regulatory interface forum held in June. The purpose of the meeting was for HM Naval Base to engage with regulators and provide updates on key activities across the naval base operations.

The site presented details of the COVID-19 impact on base operations and provided an overview of the arrangements put in place to manage the risk. These were considered to be adequate in ONRs view.

No other health and safety concerns were raised.

3 NON-ROUTINE MATTERS

Duty-holders are required to have arrangements to respond to non-routine matters and events. ONR inspectors judge the adequacy of the duty-holder response, including actions taken to implement any necessary improvements.

Matters and events of particular note during the period were:

Radiography events:

ONR met remotely with representatives of the MOD and Babcock Marine (Clyde) Ltd to discuss improvements made to the control of radiography, in response to an ONR intervention undertaken in November 2019.

ONR reviewed the changes and was satisfied that the proposed changes to the arrangements for the control of radiography are adequate. ONR will visit the Naval Base to inspect the implementation of the revised arrangements, once travel restrictions are eased.

No further regulatory enforcement action is proposed.

4 REGULATORY ACTIVITY

ONR may issue formal documents to ensure compliance with regulatory requirements.

No such documents were issued during the 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 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.

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.

ONR has 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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