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| ONR Project Assessment Report  Site Licence Condition 11 – Emergency Arrangements Request for Approval of Changes to the Nuclear Site Emergency Principles – Rolls-Royce Raynesway Sites Emergency Arrangements Principles |



ONR Project Assessment Report

**Project Name**: Approval – Nuclear Site Emergency Principles.

**Report Title**: Site Licence Condition 11 – Emergency Arrangements Request for Approval of Changes to the Nuclear Site Emergency Principles – Rolls-Royce Raynesway Sites Emergency Arrangements Principles

**Dutyholder/Applicant**: Rolls-Royce Submarines Limited.

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# Executive summary

**Permission requested**

As outlined in their letter, Rolls-Royce Submarines Limited (RRSL, the licensee) has submitted the Raynesway Sites (Nuclear Site Licences 49 and 13C) Emergency Arrangements Principles document for the Office for Nuclear Regulation’s (ONR) approval under licence condition 11(3).

**Background**

Licence condition (LC) 11 requires a licensee to make and implement adequate arrangements for dealing with any accident or emergency arising on the site and their effects. To comply with this requirement RRSL produced the documents, ‘Rolls-Royce Raynesway Sites Emergency Arrangements Principles’ (Part 1) and ‘Rolls-Royce Raynesway Sites Emergency Arrangements Developed Principles’ (Part 2), which were approved by ONR through issuance of two licence instruments 502 (for 13C and 49) in June 2008.

The licensee has now updated the emergency principles to merge the Part 1 and Part 2 documents into a single publication, update the resulting document in light of changes in the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPIR), and address comments made by ONR. The licensee is seeking ONR’s approval for the revised emergency arrangements.

**Assessment**

I have assessed the changes made to the emergency arrangements. I have found that the licensee’s changes to the content are not substantive from the previous version.

**Matters arising from ONR’s work**

There are no regulatory issues or concerns arising from this assessment.

**Conclusions**

Based on my assessment, I judge that the document meets ONR’s regulatory expectations for LC 11.

**Recommendation**

I recommend that ONR issues licence instruments 512 and 508 under LC 11(3) for Nuclear

Site Licence 49 and 13C respectively, giving ONR’s approval of ‘Rolls-Royce Raynesway Emergency Arrangements Principles’.

Table 1: List of abbreviations.

|  |  |
| --- | --- |
| Term/Acronym | Description |
| LC | Licence condition |
| ONR | Office for Nuclear Regulation |
| REPPIR19 | Radiation (Emergency Preparedness and Public Information) Regulations 2019 |
| RRSL | Rolls-Royce Submarines Limited |

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# Permission requested

1. As outlined in the letter RRSL/GEN/896/Y [1], Rolls-Royce Submarines Limited (RRSL) has requested approval of its emergency arrangements principles document as required by licence condition (LC) 11(3) [1].

# Background

1. LC 11 (‘Emergency Arrangements’) clause 1 requires a licensee to make and implement adequate arrangements for dealing with any accident or emergency arising on the site and their effects. LC 11(2) allows the Office for Nuclear Regulation (ONR) to approve all or part of those arrangements, as ONR may specify, such that the licensee must not alter them without gaining ONR's approval of the altered arrangements (LC 11(3)).
2. In order to comply with LC 11(1), Rolls-Royce Submarines Limited (RRSL, the licensee) produced and implemented ‘Rolls-Royce Raynesway Sites Emergency Arrangements Principles’ (Part 1) [2] and ‘Rolls-Royce Raynesway Sites Emergency Arrangements Developed Principles’ (Part 2) [3] as the top-level documents of its emergency arrangements for Nuclear Fuel Production Plant Raynesway (nuclear site licence 49) and Neptune Reactor Raynesway (nuclear site licence 13C). These documents were approved by ONR by issuance of licence instrument 502 for site licences 49 and 13C in June 2008 [4, 5]. The licensee is now requesting ONR’s approval to implement modified arrangements, contained within the document titled ‘Rolls-Royce Raynesway Emergency Arrangements Principles’ [6].
3. The licensee has produced this document [6] to comply with the requirement of LC 11(3).
4. The licensee has now updated the emergency principles to:

* Merge the 2005 Part 1 [2] and Part 2 [3] documents into a single publication [6];
* Update the document in light of changes to REPPIR, specifically the implementation of REPPIR 2019 [7]; and
* Address comments made by ONR [8].

# Assessment and inspection work carried out by ONR in consideration of this request

1. ONR has carried out an assessment of the submitted document [6] with consideration to the comments raised in [8] and to ensure no other substantive changes have been made.
2. Reference [8] refers to two administrative changes that should be addressed:

* The paragraph stating that the document is approved by ONR and must not be amended without a further approval has been removed in the new document and should be reinstated; and
* The document states that the RRSL Raynesway site is not a COMAH site, but it became a lower tier COMAH site in the time between RRSL’s submission and ONR’s review.

1. I assessed the document with due consideration to these shortfalls and both issues have been resolved in the assessed emergency arrangements document (see page 5 of [6]).
2. I assessed the changes to the emergency arrangements and consider the changes to be non-substantive. Changes have removed details relating to description of hazards, for example, fire is still mentioned as specific hazard but examples of combustion (such as zirconium swarf) are not given. Each item in the previously assessed Emergency Arrangements Principles is retained at a level that is judged to be appropriate for this high-level document.
3. All the changes to the document ‘Rolls-Royce Raynesway Emergency Arrangements Principles’ [6] have been subject to RRSL governance, including the Nuclear Safety Committee, before submission to ONR. [1] [9]
4. The Environment Agency has no objections to the changes to document [10].

# Matters arising from ONR’s work

1. There are no regulatory issues or concerns resulting from this assessment. My sample has identified that the points raised in [8] have been addressed sufficiently and appropriate changes have been made given the high-level nature of the document.

# Conclusions

1. This report presents the findings of my assessment of the revised ‘Rolls-Royce Raynesway Emergency Arrangements Principles’ for their Raynesway Sites (nuclear site licences 49 and 13C) [6]. I judge that the document meets ONR’s regulatory expectations for LC 11.

# Recommendations

1. I recommend that ONR issues licence instruments 512 and 508 under LC 11(3) for nuclear site licences 49 and 13C respectively, giving ONR’s approval of ‘Rolls-Royce Raynesway Emergency Arrangements Principles’ [6].

# References

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| [1] | Rolls-Royce, “RRSL/GEN/896/Y - LC11 Emergency Arrangements, Request for Approval of Emergency Arrangements Principles Document Under Licence Instrument 502. ONRW-2019369590-9952”, 2023. |
| [2] | Rolls-Royce, “Rolls-Royce Raynesway Sites Emergency Arrangements Principle, RRMP 22808, Part 1, Issue 1. ONRW-2019369590-13966”, June 2005. |
| [3] | Rolls-Royce, “Rolls-Royce Raynesway Sites Emergency Arrangements Developed Principles, RRMP 22808, Part 2, Issue 2. ONRW-2019369590-13967”, September 2005. |
| [4] | ONR, “Raynesway Neptune Reactor– Nuclear Site Licence No.13C Licence Instrument No. 502 Approval Under Licence Condition 11(3) – Emergency Arrangements. CM9 2008/230443”, June 2008. |
| [5] | ONR, “Raynesway NFPP– Nuclear Site Licence No.49 Licence Instrument No. 502 Approval Under Licence Condition 11(3) – Emergency Arrangements. CM9 2008/214023”, June 2008. |
| [6] | Rolls-Royce, “Rolls-Royce Raynesway Emergency Arrangements Principles EDNS97040295491 Version 1.0, ONRW-2019369590-9955”, November 2023. |
| [7] | “Radiation (Emergency Preparedness and Public Information) Regulations 2019”. |
| [8] | ONR, ONR-OFD-CR-23-173, Rolls-Royce Submarines Limited - Emergency Arrangements Principles Discussion. CM9 2023/34681, June 2023. |
| [9] | Rolls- Royce, NSC/1310, Rolls-Royce Submarines Limited (RRSL), Nuclear Safety Committee (NSC) Meeting 2023/10, October 2023. |
| [10] | Environment Agency (EA), Email communication with Environment Agency Nominated Site Inspector, ONRW-2019369590-14503. |