



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

Report for period 01 January – 30 June 2021

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/lc/>).

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.



Table of Contents

1	Inspections	3
2	Routine Matters	3
3	Non-Routine Matters.....	6
4	Regulatory Activity	7
5	News from ONR.....	8
6	Contacts	8

1 Inspections

Dates of inspection

The ONR nominated site inspector made inspections on the following dates during the report period (January – June 2021):

- 19 – 21 April.
- 18 May.
- 15 – 16 June.
- 28 – 30 June.

Other site, project, and specialist inspectors made inspections on the following dates during the report period (January – June 2021):

- 19 – 21 January.
- 10 – 11 February.
- 23 – 25 February.
- 15 – 19 March.
- 29 – 31 March.
- 26 – 29 April.
- 11 – 12 May.
- 17 – 20 May.
- 25 – 27 May.
- 8 – 10 June.
- 21 – 25 June.
- 28 – 30 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

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/station) covered the following:

- examination, maintenance, inspection and testing;
- management of operations including control and supervision;
- modifications to plant, equipment and safety cases;
- emergency preparedness;
- incidents on the site;
- radioactive waste management;
- organisational changes;
- periodic safety review;
- conventional (non-nuclear) health and safety;
- compliance with DRDL's arrangements for COVID-19 social distancing and other related health protection measures.

During the reporting period, ONR judged the arrangements made and implemented by the site in response to safety requirements to be satisfactory in the areas inspected. Where improvements have been identified, the licensee has made a commitment to address those issues, and ONR inspectors will closely monitor progress during future site inspections. Where necessary, ONR will take formal regulatory enforcement action to ensure that appropriate remedial measures are implemented to reasonably practicable timescales.

Members of the public, who would like further information on ONR's inspection activities during the reporting period, can view site Intervention Reports at www.onr.org.uk/intervention-records on our website www.onr.org.uk. Should you have any queries regarding our inspection activities, please email contact@onr.gov.uk.

Other work

SITE DEVELOPMENTS AND FUTURE NUCLEAR FACILITIES

ONR continues to engage on the project to a number of replacement docking capabilities within the licensed site, including the ability to defuel the Laid-Up Submarines (LUSM), and the need to provide deep maintenance support to current and future submarine classes.

DEVONPORT NUCLEAR SAFETY STRATEGY

ONR continues to engage with DRDL on the content and timescales for delivery of its Nuclear Safety Improvement Programme (NSIP). ONR has focused on targeted areas of improvement, as that will 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.

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 focused on areas of performance improvement and areas of concern, and reviewed the extent to which commitments made at the previous Annual Review had been met, as well as providing a strategic forward look over the next year.

ENGAGEMENT WITH SAFETY REPRESENTATIVES

Site inspectors held several 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

Most 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 covered by this report.

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.

Matters and events of particular note during the period were:

INF1 2021/18 and INF1 2021/119 - 9 Dock Shut Down Core Monitoring

As part of post-refuelling operations, the licensee uses criticality monitoring circuits to ensure de-boronation of systems is completed safely. The licensee identified several defects on these monitoring circuits that required diagnostic intervention and defect rectification, prior to continuation and completion of the de-boronation phase of post-refuelling operations.

The incidents were dealt with in accordance with the licensee's arrangements, which are deemed to be adequate, and ONR monitored the situation throughout, to ensure that control of operations was both conservative in terms of decision-making, and systematic in terms of completion of the required tasks. ONR undertook several regulatory follow-up activities and confirmed that operations at site remained safe.

INF1 2021/118 and INF1 2021/153 – Dockside Cranes

Over the period of this report, the licensee has reported several incidents related to operation of the dockside cranes within the main deep maintenance facilities, with incidents related to crane misalignment and installation of safety monitoring circuits.

The incidents were dealt with in accordance with the licensee's arrangements, which are deemed to be adequate, and ONR monitored the situation throughout, to ensure that the control of activities involving these cranes was undertaken in accordance with appropriate safe systems of work. ONR also undertook several regulatory follow-up activities and confirmed that these operations at site remained safe.

INF 1050 – NEMSFAC

Following a planned move of a primary system component, removed from a Laid Up Submarine (LUSM) on the defence authorised site and then transferred to the NEMSFAC C2 area on the licensed site, the licensee identified a small amount of contaminated liquid that had leaked from within the component packaging on to the C2 area floor.

The incident was dealt with in accordance with the licensee's arrangements, which are deemed to be adequate, and ONR monitored the situation throughout, to ensure that the risk of contamination was managed appropriately. ONR plans to undertake regulatory follow-up activities at site, to confirm that related operations at site remain safe.

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.

- The following LIs, Enforcement Notices and Enforcement letters have been issued during the period:

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

Date	Type	Ref No	Description
26/02/21	Enforcement Letter	ONR-EL-20-034	Regulatory enforcement arising from INF1 2020/661

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

5 News from ONR

For the latest news and updates from ONR visit the website and sign up for our ebulletin (<http://www.onr.org.uk/ebulletin/index.htm>).

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, 2022

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

Published 01/22

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.