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| ONR Site Report  BAE Systems Marine Limited – Devonshire Dock Complex |



ONR Site Report

BAE Systems Marine Limited - Devonshire Dock Complex

Report for period: 1 July – 31 December 2023

Authored by: Nominated Site Inspector

Approved by: Superintending Inspector

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Foreword

This report is issued as part of our 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 BAE Systems Marine Limited (BAESML) Local Liaison Committee (LLC) and are also available on our website (<http://www.onr.org.uk/llc/>).

Our site inspectors usually attend BAESML Local Liaison Committee (LLC) 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 email us at [contact@onr.gov.uk](mailto:contact@onr.gov.uk).

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# Inspections

## Date(s) of Inspection

Our ONR site inspector undertook site-based interventions on the following dates during the report period:

* 6, 16 July;
* 23 August;
* 27, 28 September;
* 10, 11, 12 October; and,
* 6 December.

# 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 etc 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 of the Devonshire Dock Complex covered the following:

* management of operations including control and supervision;
* emergency preparedness;
* periodic safety review; and
* conventional (non-nuclear) health and safety.

Members of the public, who would like further information on our inspection activities during the reporting period, can view site Intervention Reports at [www.onr.org.uk/intervention-records](http://www.onr.org.uk./intervention-records).

Should you have any queries regarding our inspection activities, please email [contact@onr.gov.uk](mailto:contact@onr.gov.uk).

## Emergency Exercise: ‘INDIGO 23’

In October 2023, a team of our inspectors observed BAESML’s emergency demonstration exercise “INDIGO 23”, making observations in the Nuclear Emergency Headquarters, Exclusion Zone Reception Centre, and technical cell, as well as observations about the deployed teams.  We judged that this was an adequate demonstration of BAESML’s emergency arrangements.  
  
We noted good interactions between teams, particularly the interactions between the Strategic Team and Tactical Command Cell, which has improved since INDIGO 22 and 22R. Good team and individual competence across all areas was also demonstrated. Use of written processes and ‘aides memoir’ was also observed and delivered positive results.

We will continue to engage with BAESML to ensure the challenge presented by emergency demonstration exercises is progressively increased.

## Other Work

Our site inspector held a periodic meeting with safety representatives, to support their function of representing employees and receiving information on matters affecting their health, safety and welfare at work.

BAESML schedules regular regulatory interface meetings (RIF) covering an overview of the build programmes, and improvements to the site safety cases and their implementation. The RIFs also cover regulatory issues progress and oversight of the site redevelopment project (SRP) work. This includes regulatory oversight of the construction of the new facilities on the licensed site. Our ONR site and project inspectors attended these meetings (usually virtually) during the period.

# Non-Routine Matters

Licensees are required to have arrangements to respond to non-routine matters and events. Our 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:

## Cable Strike Event

Originally reported in the BAESML Site Report 1 January – 30 June 2023, We undertook preliminary enquiries into this event and determined that it was appropriate to issue an enforcement letter to BAESML, focusing on shortfalls against the Construction (Design & Management) Regulations 2015, regulation 4.

This regulation requires (amongst other things) clients (in this case BAESML) to provide pre-construction information to every designer and contractor appointed to the project. We determined that the information provided to the contractor was not fully understood by BAESML and this was a contributing factor in the event.

Alongside the enforcement letter, we also created a level 3 regulatory issue that will track BAESML’s improvement progress in three areas:

* Updating details relating to the location of underground services for existing and planned construction areas
* Provision of up-to-date information on underground services to designers, contractors and others
* Ensuring that any contractor undertkaing excavation activites on the site has the required knowledge, skills and experience.

The regulatory issue is planned for closure in March 2024.

## Dropped Load Event

In August 2023, lifting operations controlled by Morgan Sindall Construction & Infrastructure Limited were being undertaken to offload crane rails from a flat-bed trailer. Whilst lifting the final crane rail, the rail became unbalanced and fell, landing on the flat-bed trailer from which it was being lifted. Whilst there were no injuries from the event, we identified a risk of serious personal injury, which required regulatory action.

We issued an improvement notice to Morgan Sindall Construction & Infrastructure Limited under the Health and Safety at Work etc. Act 1974, Section 2(1) and 3(1), the Management of Health and Safety at Work Regulations 1999, Regulation 3(1) and the Lifting Operations and Lifting Equipment Regulations 1998, Regulation 8(1). Morgan Sindall Construction & Infrastructure Limited is required to comply with the improvement notice by 28 February 2024.

We are continuing our investigation into the incident at the site, operated by BAE Systems Marine Limited, so cannot publicly discuss any further details at this stage.

## 415V Busbar Strike Event

In December 2023, a team of electrical contractors were working within the Devonshire Dock Hall to install a fixed electrical circuit to power a new 240V socket. During the course of the activity, whilst creating a penetration for the cable to run through a wall, the contractors accidentally struck a 415V electrical circuit.

No injuries were sustained to the workers, and there was no risk to nuclear safety, the public or the environment as a result of the incident. The incident was reported to our nominated site inspector and preliminary enquiries are ongoing.

# Regulatory Activity

We may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, ONR issue 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 |
| 19 Sep 23 | enforcement letter | ONR-EL-23-022 | Dangers from underground electrical services |
| 6 Nov 23 | improvement notice | ONR-IN-23-001 | D58 IF1 crane rail dropped load event |

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

# News from ONR

For the latest news and information from us, please read and subscribe to our regular email newsletter ‘ONR News’ at [www.onr.org.uk/onrnews](http://www.onr.org.uk/onrnews).

# Contacts

Office for Nuclear Regulation

Redgrave Court

Merton Road

Bootle

Merseyside

L20 7HS

website: [www.onr.org.uk](http://www.onr.org.uk)

email: [Contact@onr.gov.uk](mailto:Contact@onr.gov.uk)

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