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| ONR Site Report  Rolls-Royce Submarines Limited – Nuclear Fuel Production Plant, Raynesway & Neptune Reactor, Raynesway |



ONR Site Report

Rolls-Royce Submarines Limited - Nuclear Fuel Production Plant, Raynesway & Neptune Reactor, Raynesway

Report for period: 1 January – 30 June 2024

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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 Rolls-Royce Submarines Limited (RRSL) Local Liaison Committee (LLC) and are also available on our website (<http://www.onr.org.uk/llc/>).

Our site inspectors usually attend RRSL 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 site inspector undertook interventions on the following dates during the report period:

* 6-8, 19, 27 March

# 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)
* 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 Raynesway licensed sites covered the following:

* safety culture
* 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).

## Safety culture inspection

The RRSL site inspector highlighted concerns about the culture at the contact shop at RRSL following events in previous years. These have identified potential behavioural and cultural shortfalls within the contact shop.

We carried out interviews and focus groups with a sample of the workforce over two days in March 2024. We noted that RRSL had recognised the same challenges that we had identified and had already implemented an improvement plan over several years, with the most significant changes being evident in the previous year. The evidence collected demonstrated that the changes implemented had noticeably improved the safety culture and RRSL demonstrated that it has the capability to operate safely. We judged that this provides a sound basis for future safe operations at the site as new facilities are developed, with routine oversight from us.

## Other work

In addition to our inspections listed in Section 1.1, we had other regulatory engagements with RRSL covering a wide range of topics, including conventional (non-nuclear) health and safety, radioactive waste management, radiation protection plus the annual review of safety and environment (AROSE).

We undertook a capability review of RRSL, forward-looking to its plans to significantly expand its business in support of the next generation of nuclear submarines and the AUKUS agreement. This was part of a wider defence-wide engagement on capability, with a focus on licensee’s ability to deliver the capability delivery increase safely. We concluded that RRSL is aware of the challenge and its safety duties and it provided us with significant evidence of action to proactively address future capability demand.

We continued our oversight of ongoing major construction or modification projects, such as the Neptune refurbishment project and the Dreadnought Production Facility project. These are subject to our permissioning processes, published on our website.

Our site inspector held meetings to progress routine regulatory business, such as regulatory issues database reviews, regulatory interface forums as well as meetings with the internal regulatory function. Our site inspector continues to hold weekly meetings with senior RRSL management to ensure health and safety matters continue to be addressed appropriately.

Our site inspector also continues to hold 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.

# 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.

Several events were reported to us in this period. Most were minor and we were content for RRSL’s internal investigations and learning to prevent recurrence in most cases. We keep an oversight of the outcomes and follow-up as considered necessary.

Matters and events of particular note during the period were:

## Operational conditions and limits – INF-3562

In December 2023, RRSL reported that its Interim Review of Safety process had identified a finding related to the inadequate identification of nuclear safety related assumptions and associated operational conditions and limits in the Facility Safety Cases. RRSL has produced a ‘justification for continued operation’ and has shared this with us.

RRSL has since conducted an extensive investigation, which identified and categorised action needed to ensure that the operating conditions and limits are appropriately incorporated into their safety cases.

## Contact Shop inhalation dose – INF-3060

Originally reported in the previous two RRSL Site Reports, we issued an enforcement letter to RRSL, focusing on shortfalls against the Ionising Radiation Regulations 2017, regulation 8. RRSL completed the improvements identified within the target set. We are monitoring the completion of implementation of the updated radiological risk assessments.

# Regulatory activity

We may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, we issue regulatory document 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, including the issuing of an enforcement notice.

* No LIs, enforcement notices or enforcement letters were issued during this period.

# 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).

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