

HMNB DEVONPORT AND DEVONPORT ROYAL DOCKYARD LIMITED DEFENCE NUCLEAR SAFETY REGULATOR'S QUARTERLY REPORT

1st January – 30th June 2020

FOREWORD

1. This report is issued as part of the Defence Nuclear Safety Regulator's (DNSR's) commitment to make information about inspection and regulatory activities relating to the Defence Nuclear Programme¹ available to the Authorisee, the wider Defence stakeholder community, and members of the Local Liaison Committee where these are convened. The Secretary of State for Defence is answerable to Parliament for the safety of all defence activities; he has issued a Health, Safety and Environmental Protection Policy Statement requiring the Ministry of Defence (MoD) to comply with legislation, and where there are exemptions relating to defence activities, to make, so far as is practicable, arrangements at least as good as those required by legislation. DNSR is empowered to regulate nuclear and radiological safety in the Defence Nuclear Programme. This is achieved in a manner that complements and joins up with the work of statutory regulators².

Devonport Royal Dockyard Limited (DRDL, - Babcock Marine) is both a Licensed Site and an Authorised site under MoD regulation. HMNB Devonport is an Authorised site under MoD regulation but it is not licensed. Authorisation is a process akin to licensing under the Nuclear Installations Act. DNSR Inspectors work closely with colleagues in ONR² (and other regulators); this report should be read in conjunction with theirs. This report is made available to members of the Local Liaison Committee where convened. Where possible, a DNSR Inspector will attend Local Liaison Committee meetings and will respond to any questions asked. Additionally, DNSR Inspectors may be contacted at their offices at Abbey Wood, Bristol (011791 32422).

PERIOD OF THIS REPORT

2. This report covers the quarterly reporting period from 01st January to 30th June 2020.

DNSR ON SITE

3. DNSR staff and regulatory support were on site at DRDL and/or HMNB Devonport for about 42 man-days within this reporting period, in particular:

13th – 16th January
21st – 23rd January
03rd – 05th February
10th – 12th February

26th – 27th February
02rd – 04th March

¹ Comprising the Naval Nuclear Propulsion Programme (NNPP) and the Nuclear Weapon Programme (NWP).

² The Office for Nuclear Regulation (ONR), the Environment agency (EA) and the Scottish Environment Protection Agency (SEPA).

DNSR – Response to COVID-19

4. DNSR-IRM Undertook a review of its plans in light of the COVID-19 and have considered its Preliminary impact on DNSR regulatory interventions. Resulting in a series of supporting Level 4 & 3 RIFs by Skype/Telcon calls to establish actions, capacity and resilience of the HMNB(D) / DRDL Sites in managing this situation.

Whilst the lack of access to site provided us with a number of challenges, we continued to provide a high degree of oversight to site arrangements and safety case development to demonstrate that regulation remains an important focus to site arrangements.

HMNB(D) / DRDL are reviewing its status continually to ensure they maintain safety. Both Sites Authorisation Groups are currently quorate and have full coverage and therefore safe to control work. Production and Commissioning are managing their resources to ensure safe to conduct work. As part of that DACC has been stood up and are looking at the number of DAPs and ASQEPs on-site and reporting daily.

Focus on site looks at three levels;

1. Safe Site
2. Safe to Control Work
3. Safe to Conduct work

DNSR REMOTE SITE ENGAGEMENTS

5. DNSR staff and regulatory support were engaged a number of Level 4 & 3 RIFs remote from sites with DRDL and/or HMNB Devonport for about 56 man-days within this reporting period, in particular:

16 th – 19 th March	18 th – 21 st May
06 th – 09 th April	15 th – 18 th June
04 th – 05 th May	22 nd – 24 th June

This includes dial in from the DNSR Nuclear Propulsion Regulatory, Principal Site Inspector and his team and DNSR technical assessment support.

ROUTINE VISITS

6. Routine engagements were undertaken with the sites were made:
- To gain evidence that the Authorisee's safety management arrangements remained adequate and assurance that their implementation meet the Authorisation Conditions.
 - Drive improved safety performance and behaviours identified in the Joint ONR/DNSR Intervention Strategy for DRDL and the DNSR Intervention Strategy for the Naval Base.

OFFICIAL

- Monitor the Authorisee's actions in response to incidents, operations, maintenance, modifications, inspection findings, regulatory enforcement, safety case changes and other matters that might affect safety.

7. Arrangements made and implemented were considered adequate in the areas inspected or appropriate recovery improvement programmes are in place where gaps in compliance were identified. DNSR have continually monitored progress against previously raised issues and sought to influence closure within a suitable timeframe

8. Specifically, visits were made to:

- DNSR System Based Inspection of DRDL arrangements that demonstrate the Design Intent of the PWR2 Primary Circuit Isolation Valves (PCIVs) is maintained through the Deep Maintenance Period (DMP) and that the through life safety risk remains tolerable and ALARP.
- Review the progress and future direction of the update to the 5 Basin Safety Case.
- Provide Regulatory guidance and advice to DRDL Major infrastructure Projects.
- Review of Naval Base progress made against Route to Green improvement Closure.

9. Remote Engagements were made to:

- DNSR Inspection of HM Naval Base Devonport (HMNB(D)) arrangements for compliance with the requirements of Authorisation Condition 15 – Periodic Reviews to an Authorised Site.
- Provide Regulatory assurance from observing the Internal challenge in conducting Operation Readiness Review for RPV Installation.
- Provide Regulatory guidance and advice to DRDL Major infrastructure Projects.

NON-ROUTINE MATTERS

10. Authorisees are required to have arrangements to respond to un-planned matters and events, including actions to implement necessary improvements. DNSR reporting criteria and intervention thresholds are consistent with the ONR event reporting criteria and thresholds.

11. During this period, there was Nil DINF1 reported.

PERMISSIONING AND ENFORCEMENT ACTIVITY

12. During this period, DNSR raised 1 Recommendations. No Improvement Notices or Corrective Action Requirements (CARs) were issued. DNSR will monitor progress against previous CARs and Recommendations through monthly engagement on Site.

During this period, DNSR Permissioned: Nil

Prepared by
DNSR-IRM
July 2020

Distribution:

NBC, HMNB Devonport
DRDL Nuclear Assurance Director
ONR nominated site Inspector
EA site inspector
Local Liaison Committee
RSD project officer
File