

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

1st October – 31st December 2019

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 October to 31st December 2019.

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:

14th – 16th October
23rd October
28th – 30th October
25th – 27th November

11th – 13th November
3rd – 4th December
9th – 11th December

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).

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

ROUTINE VISITS

5. Routine visits to the site were made to:

- Inspect the Authorisee's safety management arrangements to ensure that they are adequate and suitably implemented to 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.
- 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.

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

7. Specifically, visits were made to:

- Leadership for Management of Safety Workshop (Naval Base).
- DNSR Inspection of HM Naval Base Devonport (HMNB(D)) arrangements for compliance with the requirements of Nuclear Authorisation in 3 Basin following its change of status to an Authorised Site.
- DNSR themed Inspection of HMNB(D) arrangements for maintenance of the NRP at the Authorised Site, in particular was the management of NRP spares to support Base Maintenance Period (BMP) activities. (Examination, Inspection, Maintenance and testing). Objective of the inspection was to review HMNB(D) arrangements
- DNSR Regulatory assessment of Devonport Level 1 Emergence Exercise.
- DNSR themed Inspection of Reactor Pressure Vessel Closure Head to be fitted during Deep Maintenance Period (Refuel). Objective of the inspection was to review DRDL arrangements that demonstrate the design intent is maintained from arrival on the Devonport site through to completion of the final installation.

OFFICIAL

- DNSR Compliance Inspection of DRDL arrangements for compliance with Authorisation Condition 6 (Documents, Records) and 25 (Operational Records).
- DNSR Compliance Inspection of DRDL arrangements for compliance with Authorised Condition 28 (Examination, Inspection, Maintenance and testing).
- Review of Naval Base progress made against Route to Green improvement Closure.
- 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.

NON-ROUTINE MATTERS

8. Authorisees are required to have arrangements to respond to unplanned 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.

During this period, there was no DINF1 reported.

PERMISSIONING AND ENFORCEMENT ACTIVITY

9. During this period, DNSR raised 4 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
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Distribution:

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