

Devonport Local Liaison Committee Interim Brief

JULY 2020





Executive Summary

This report provides an interim brief to members of the Devonport Local Liaison Committee (LLC) in place of the scheduled July 2020 meeting, which has been cancelled as a precaution against the spread of COVID-19.

It's now been over 100 days since the lockdown measures were introduced in the UK. Following these measures the maintenance of safe and secure operations across the Devonport site has remained a priority. Now that restrictions are gradually easing, as a community within Devonport Royal Dockyard and HMNB Devonport we are following the measures required to manage the impact of COVID-19, continue operating in line with Government guidance and are protecting the health and wellbeing of our workforce and anyone operating on our sites.

Effective communication remains a key priority, so while a meeting of the LLC is not consistent with social distancing, the purpose of this report is to provide an interim update of the key work activities undertaken over the past six months.

Mike Homer, Managing Director – DRDL



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1 Background

The LLC provides a forum to communicate and discuss Devonport cross-site nuclear operations and safety issues with representatives of members of the public, including the maintenance and exercising of the Nuclear Emergency Response Organisation (NERO). Although there is no legal driver to hold such meetings they are regarded as good practice. To date, the biannual meetings have been held at a public venue and chaired alternately by Naval Base Commander (NBC) and Managing Director (MD) Devonport Royal Dockyard Limited (DRDL).

As a precautionary measure, in support of Government guidelines put in place to reduce the risk of spreading COVID-19, the July 2020 meeting of the LLC has been cancelled. This briefing document has therefore been produced to provide LLC members with an update of operations and safety performance on the Devonport site for the six month period January - June 2020.

The maintenance of safe and secure operations across the Devonport site and the wellbeing of our staff have remained enduring priorities for the MOD, Royal Navy and Babcock throughout the reporting period and in particular following the adoption of special measures to manage the impact of COVID-19. Refer to section 4 of this brief for further information about these.

2 Update on relevant key site operations

2.1 Surface Ships Update

Type 23 frigate support dominates the dockyard's surface ship work programme, with a number of Type 23 frigates at various stages of their upkeep periods. The docks in the Frigate Support Centre are fully occupied. Two Type 23s have been handed back to the customer and a further four are in upkeep periods. An amphibious platform is currently in phase 2 of a 3 phased Optimised Support Programme.

After an initial pause in production during March and April, projects within the Warships programme are proceeding with COVID-19 / social distancing controls in place. Fleet Time engineering has continued throughout the lockdown period to support deployed and base-port platforms critical to our Customer's operational priorities.

2.2 Facility Update

Babcock is working closely with the MOD to develop a joint strategic plan for the site to 2030 and beyond; this is due to be presented to Plymouth City Council at the end of July.

Significant investment continues across the site with multi-million pound Capex investment for 19/20 and 20/21. Typical areas of investment include:

- Building improvements/change of use,
- Amenity and office space,
- Electrical infrastructure and
- Dock readiness.

This investment will further enhance safety and resilience, and demonstrates the company's ongoing commitment to the site.

A-Class at Devonport – the upgrade programme is expected to run between 2020 and 2026, with a significant investment to provide modern facilities in support of the next class of submarines. Ground surveys for the 5 Basin area have commenced, along with work to upgrade 8 Dock. Studies to minimise the impact of this construction activity and use novel means of material delivery are underway. The upgrade will also provide job opportunities across a range of roles, (either directly or through sub-contractors).

2.3 Submarines Update

The greatest change since our last update in January is the COVID-19 pandemic and the implications it has had for submarine support. Whilst some projects were placed into a controlled “pause”, defence output priorities were agreed with the MOD and some activity continued in this area during lockdown in strict accordance with government guidelines.

During the reporting period, we have supported two visits by T Class submarines to the Naval Base Tidal X Berth and assisted in their routine maintenance prior to returning to operational duties.

Much work continues on ensuring we are operating safely, compliantly and as efficiently as possible, with a whole (Submarine) Enterprise approach.

This work and our COVID-19 additional measures were reviewed in June by the Office for Nuclear Regulation (ONR) who praised the improved levels of control we had implemented.

3 Safety Performance

3.1 Reportable Nuclear & Radiological Events

- Babcock
 - Six International Nuclear Event Scale events have been reported to the Regulators since the last LLC, all of which were below scale (Level 0) and assessed as of no safety significance. Four were associated with maintenance and two were related to challenges to Identified Operating Instructions.
- HMNB Devonport
 - No reportable events

3.2 RIDDOR (> 7 Day lost time events)

- Babcock
 - 12 x reportable occurrences (compared with eleven in previous six month period) including:
 - injuries associated with trips and falls
 - injuries to hands
 - traffic accident
 - injuries from handling, lifting or carrying resulting in back strain

- HMNB Devonport
 - 2 x reportable occurrences (compared with four in previous six month period)
 - 1 member of the RN sustained an injury when falling off their bicycle on the site.
 - 1 member of the public treated in hospital (no serious injury) following a fall from moped on the site.

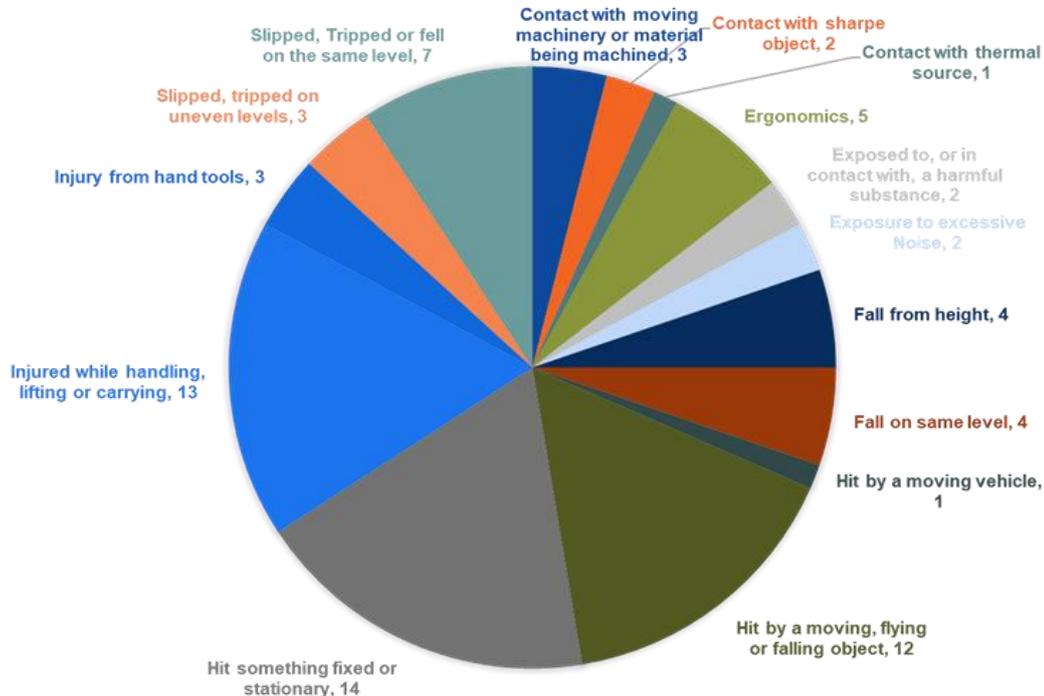
3.3 Accident Causation

- Babcock (see Pie chart below)

The total number of accidents since the last LLC was 76. The biggest contributors to injury rates on site were:

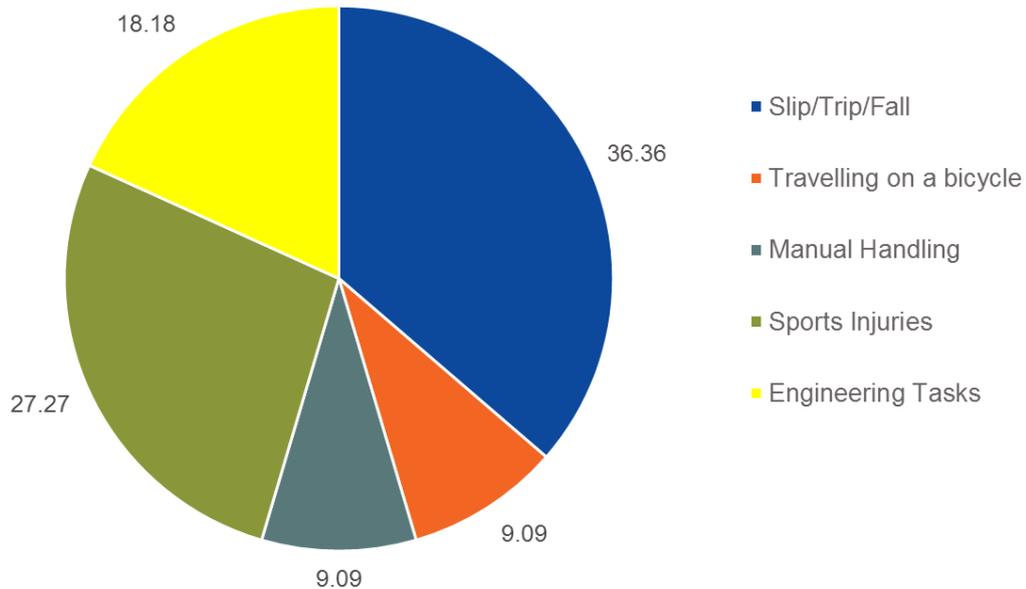
 - Hit by moving, flying or falling objects had a major influence, the majority of these events are made up from injuries sustained from dropped tooling/items or foreign bodies in eyes (Dust etc).
 - Slips, trips and falls, split between facility condition (raised edges, potholes, etc) and victim of other persons actions (housekeeping).
 - Hitting something stationary – protruding or unprotected scaffold issues, and spatial awareness issues.
 - Manual Handling issues also had a significant influence.

Babcock Accident Causation



- HMNB Devonport (See Pie chart below)
 - 11 NBC(D) injury accidents, involving NBCD personnel / infrastructure / representative sport excluding RIDDORs (compared to 9 last period): None of the accidents were attributable to NB nuclear activities.

HMNB(D) Accident Causation



3.4 Fire Alarms and Devon and Somerset Fire and Rescue Service (DSFRS) attendance

- 78 Alarm calls in the period – no attendance by DSFRS (68 Babcock, 10 HMNB).
- 3 Fire Exercises with no attendance by DSFRS.
- 1 False Alarm raised by person reporting smoke coming from a building. DSFRS attended. This call was due to smoke coming from compressors after being fired up. No fire.
- 1 Rescue DSFRS attended to assist with a casualty rescue.

3.5 Radioactive Waste Disposals

Routine radioactive waste disposals continue to take place, all well within permitted limits. The following table details the annual discharges of liquid and gaseous radioactive wastes by DRDL. 2020 data for liquid discharges is the 12 month rolling total up to end of April 2020 - based on the latest approved returns provided to Environment Agency (EA). Gaseous discharges are only reported annually to EA – hence no reported data yet for 2020; this will be provided to EA in February 2021. The gaseous returns for 2019 include the expected slight increase in tritium discharges to atmosphere associated with defueling activities undertaken last year, which are still well below the permitted limit. Radioactive waste has also been transferred off site for further processing and disposal, in accordance with DRDL’s environmental Permit, keeping waste held on site to a minimum.

In February, the approved flowmeter used to measure the volume of discharges was taken out of service during an equipment upgrade. As DRDL used alternative means to measure the flows, without informing the Environment Agency in advance, we reported this to the site inspector. There was no environmental impact and improvements have been made to procedures on site to prevent a recurrence.

Radioactive waste discharge summary		2017	2018	2019	Rolling 12 months to Apr 2020	Limit
Aqueous Discharges to Tamar	Tritium (GBq)	29	12	5	4	700
	Co-60 (GBq)	0.02	0.01	0.002	0.002	0.8
	C-14 (GBq)	0.11	0.03	0.03	0.02	1.7
	Others (GBq)	0.02	0.03	0.003	0.005	0.3
Aqueous to Sewer	Tritium (GBq)	0.052	0.047	0.040	0.031	2
	Co-60 (GBq)	0.006	0.003	0.002	0.002	0.35
	Others (GBq)	0.082	0.076	0.062	0.053	0.65
Gaseous	Tritium (GBq)	0.330	0.367	1.73	Discharges remain within rolling quarterly notification levels	4
	C-14 (GBq)	16.930	0.315	0.250		66
	Ar-41(GBq)	0.006	0.009	0.005		15
	Beta Particulate (GBq)	0.00002	0.00002	0.00002		0.0003

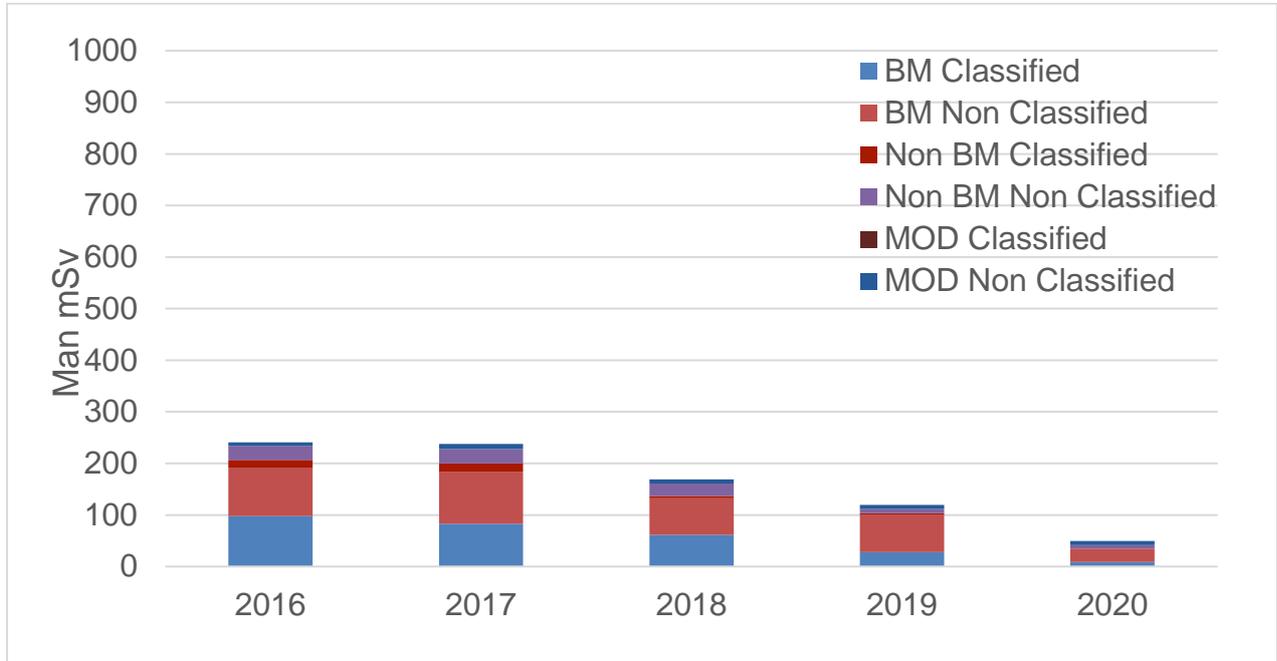
3.6 Environmental Monitoring

Marine environmental monitoring for radioactivity was carried out in January 2020. All dose rates were within normal bounds, no cobalt-60 or tritium was detected in any samples and there was a low level of carbon-14 in one sample, within normal levels. Due to COVID-19 restrictions, the second quarterly survey was cancelled and the third quarterly survey (normally carried out in July) has been deferred to September. An assessment was carried out to demonstrate that these changes represented a reasonable deviation under the social distancing and lockdown restrictions in place, and there was no environmental impact associated with the change. These changes were made with the agreement of the Environment Agency, via a request under one of their COVID-19 Regulatory Position Statements.

3.7 Dosimetry

MOD and Babcock are committed to the principle of keeping any radiation doses to which people are exposed to “As Low as Reasonably Practicable” (ALARP). Doses to individual members of the workforce remains low – with the highest dose to an individual to 1st July 2020 of 0.6 mSv in year (well below the legal annual limit for a classified radiation worker); this is in line with results from 2019. COVID-19 restrictions have delayed some work so far this year, resulting in lower than predicted doses. These are expected to return to planned levels as restrictions are eased.

The DRDL Dosimetry Service provides chest, whole body monitoring and internal dosimetry assessment services – 23 scans have been completed in 2020. Of these, seven were precautionary post incident monitoring with no positive intakes being detected. The whole body monitoring service has been available for incident monitoring throughout the COVID-19 restrictions, but routine monitoring has not been conducted.



Devonport Site Collective Dose (man mSv)

4 Site mitigation adopted for COVID-19 with respect to maintenance of safe operations

Following the Prime Minister’s announcement on 23 March, we significantly reduced the workforce numbers operating on site to maintain the safety and security of our people and operations. With the easing of lockdown restrictions we are now increasing the workforce on site, focussed on our operational delivery to ships & submarines, with close discussion between Babcock and HMNB Devonport. The majority of our office based teams continue to work from home in line with Government advice. Throughout this period we provided support to a number of local NHS providers including with 3D printing face shields and provision of specialist screens to the Devon and other air ambulance services.

Working arrangements were reviewed against Government and Regulator guidance for COVID-19 mitigation and revised where required. A live dashboard was developed for essential roles to assess resource availability to support safe site operations. A formal ONR inspection on Control of Work requirements in relation to COVID-19 was assessed as GREEN with no observations or findings.



5 Implementation of REPPiR 19 requirements into NERO plans & arrangements

Prompt action was taken to safeguard the site Nuclear Emergency Response Organisation (NERO) against the impact of COVID-19. Following lockdown the viability of the NERO was monitored on a daily basis initially (now weekly) to ensure sufficient personnel were confirmed available to respond if required. NERO capability has been maintained throughout.

As discussed at the last LLC a communications exercise was repeated on 25 Feb 20 – successfully testing alerting arrangements for external agencies. With regard to future NERO exercises, planning is underway for a Level 1 demonstration exercise (site only) on 14 Oct 20.

In accordance with the requirements of REPPiR 19 the Sites' detailed emergency plan (DEVNUSAFE) has been revised and re-issued to incorporate minor changes and improvements however there have been no significant changes to the overall response strategy.

We have continued to work closely with Plymouth City Council and other agencies to update the Off-Site Plan (DOSEP) and Public Information Leaflet - see Plymouth City Council report at annex for more details.

6 Update on actions from previous meetings

There was one action from the January 2020 meeting. A letter from a member of the public was passed to the Chair at the meeting regarding an off-site planning issue. This was forwarded to Plymouth City Council and Plymouth NHS Trust replied to the member of the public on 15 April 2020. Action complete.

Next LLC Meeting

NBC and MD DRDL anticipate that the next meeting will be held as scheduled in January 2021, but this will be kept under review in accordance with Government advice in relation to COVID-19. A decision and subsequent date for the next meeting will be communicated nearer the time.

If any member of the LLC has any questions regarding the content of this brief, please send to Mr Christopher Crook (Christopher.Crook508@mod.gov.uk) Secretary of the LLC.



UPDATE REPORT FOR DEVONPORT LOCAL LIAISON COMMITTEE



Devonport Off-Site Emergency Plan

Following the regulatory changes introduced by the Radiation (Emergency Preparedness and Public Information) Regulations (REPPiR) 2019, the Devonport Off-Site Emergency Plan has been reviewed and updated. The revised plan (version 7.0) was taken through the Council's governance process in early April and following this, was submitted to the Office for Nuclear Regulation in advance of the compliance deadline of 20 May 2020. Completion of this off-site plan review and revision has ensured full continuity of the off-site emergency arrangements during the transition phase from the old REPPiR 2001 regulations. A link to the public copy of the Devonport Off-Site Emergency Plan can be found on the Plymouth City Council website (www.plymouth.gov.uk/emergencies).

Detailed Emergency Planning Zone (DEPZ)

The Radiation (Emergency Preparedness and Public Information) Regulations (REPPiR) 2019, require Plymouth City Council to prepare a detailed off-site emergency for the purpose of restricting, so far as is reasonably practicable, public exposure in the event of a reasonably foreseeable radiation emergency. As part of the planning and in accordance with Regulation 8(1) of REPPiR, Plymouth City Council had to determine the Detailed Emergency Planning Zone (DEPZ), which is defined as an area extending out to at least 1.5km from operational nuclear submarine berths and anchorages. In reviewing the existing zones, Plymouth City Council used the information contained within the Consequences Reports received from the Ministry of Defence and Babcock International and also the principles supplied by the Office for Nuclear Regulation; local geographic, demographic and practical implementation factors; avoidance of bisecting local communities; inclusion of immediately adjacent vulnerable groups; credibility and confidence in the extent of the DEPZ and benefits and dis-benefits of protective actions. After analysing all communities on the extent of, or immediately beyond the 1.5km DEPZ, it was identified that an additional 66 residential properties and 2 commercial properties should be included within the newly defined DEPZ. This newly defined area can be seen both in the revised plan and also within the Public Information Booklet.

Public Information Booklet

Plymouth City Council has a duty to let members of the public and businesses in the Detailed Emergency Planning Zone around the Devonport Site know, in advance, what they should do in the unlikely event of a nuclear emergency. This information should be reviewed and published every 3 years and Plymouth City Council has worked in partnership with the Ministry of Defence, Devonport Royal Dockyard Limited, Cornwall Council, Devon County Council and South Hams District Council to produce and distribute the new June 2020 booklet to each home and business within the Detailed Emergency Planning Zone. The booklet also gives information on how residents and businesses can sign up to a free emergency notification service which will inform them of what to do, in the unlikely event of a nuclear emergency. Both the booklet and the registration link can be found on the Plymouth City Council website (www.plymouth.gov.uk/emergencies).

Ruth Harrell
Director of Public Health