

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

1st July – 31st December 2020

FOREWORD

This report is issued as part of the Defence Nuclear Safety Regulator's (DNSR) 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

- This report covers the quarterly reporting period from 01st July to 31st December 2020.

DNSR ON SITE

- DNSR staff and regulatory support were on site at DRDL and/or HMNB Devonport for about 22 man-days within this reporting period, in particular:

- 3rd – 4th August
- 1st – 2nd September
- 14th – 17th September
- 14th – 15th October

DNSR – Response to COVID-19

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

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).

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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 continues to provide 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 their 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, Devonport Accident Control Centre (DACC) has been stood up and are looking at the number of Duly Appointed Person (DAP) and Appointed Suitably Qualified and Experienced Person (ASQEP) on-site and reporting daily.

Focus remains;

1. Safe Site – Is the Site Safe with no / limited work on-going.
2. Safe to Control Work – Do we have the means safely to control work on site.
3. Safe to Conduct work – Do we have the teams able to conduct the work with the required levels of supervision.

DNSR REMOTE SITE ENGAGEMENTS

- DNSR staff and regulatory support were engaged at a number of Level 3 & 4 RIFs remote from site with DRDL and/or HMNB Devonport for about 67 man-days within this reporting period, in particular:

01 st – 02 nd July	12 th – 15 th Oct
13 th – 16 th July	02 nd – 03 rd Nov
03 rd – 05 th Aug	09 th – 12 th , 17 th Nov
17 th – 21 st Aug	24 th – 26 th Nov
01 st – 03 rd Sept	15 th – 18 th June
14 th – 17 th Sept	07 th – 10 th Nov
28 th Sept – 1 st Oct	07 th – 12 th Nov

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

VISITS ON SITE

Identified Interventions were undertaken with the sites:

- To gain evidence that the Authorisee's safety management arrangements remained adequate and assurance that their implementation meets the Authorisation Conditions.
- To 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.

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- To 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.

5. 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.

6. Specifically, visits were made to:

- DNSR Compliance Inspection of DRDL arrangements for Authorised Condition 7 Incidents on Site.
- DNSR themed Inspection of DRDL arrangements for 5 Basin - In Water Engineering.
- DNSR Compliance Inspection of HMNB(D) arrangements for Authorised Condition 15 – Periodic Review.
- DNSR themed Inspection of Naval Base progress made against PRS Safety Improvement Plans – In depth review of production and governance of SIPs to support the PRS regulatory assessment.

7. 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 3 Basin MCP Programme of work.
- Review HMNB(D) AC Compliance 6 monthly review.
- Provide Regulatory guidance and advice to DRDL Major infrastructure Projects.
- Review of Naval Base progress made against Route to Green improvement Closure.

NON-ROUTINE MATTERS

7. 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.

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

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PERMISSIONING AND ENFORCEMENT ACTIVITY

9. DNSR regulatory permission letter following assessment of the HMNB(D) PRS2 Global Assessment Report and associated documentation granted.

10. During this period, DNSR raised 2 Corrective Action Requirements (CARs) and 13 Recommendations with no Improvement Notices. DNSR will monitor progress against previous CARs and Recommendations through monthly engagement on Site.

Prepared by
DNSR-IRM
Jan 2020

Distribution:

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

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