

Devonport Local Liaison Committee Report

16 February 2021

July - February 2021

Introduction

This report covers our regulation at both Devonport Royal Dockyard Limited (DRDL) and HM Naval Base (HMNB) Devonport. The Environment Agency's lead nuclear regulator for both sites is Richard Lee; he is supported by the previous lead regulator, Gary McMeekan, who is now leading our regulation of Hinkley Point C.

Richard and Gary are both members of the Environment Agency's Southern Nuclear Regulation Group (NRG) which is based in Wallingford in Oxfordshire. The Environment Agency staff who regulate non-nuclear activities on the Devonport site are based in local offices.

Contact Details

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Attendance at site

In response to the coronavirus pandemic, we discontinued site-based regulatory activities from March 2020 at all nuclear sites (other than in exceptional circumstances). We carried out one inspection in September 2020 in response to the temporary shutdown of part the radioactive effluent treatment plant. We have maintained regular contact with both DRDL and HMNB by telephone and e-mail in addition to formal correspondence. The Environment Agency receives reports from DRDL and HMNB on radioactive discharges and environmental monitoring, and these are placed on the public register.

customer service line
03708 506 506

incident hotline
0800 80 70 60

floodline
03459 88 11 88

Current regulatory issues

Radioactive discharges and disposals

All routine radioactive discharges and disposals from the Devonport site remain well within the limits set by our Environmental Permit (DRDL) and Approval (HMNB).

Other regulatory regimes

In addition to nuclear regulation, the Environment Agency regulates both DRDL and HMNB under a number of regulatory regimes. We regulate:

- Non-radioactive emissions to air from combustion activities
- Non-radioactive discharges and emissions from certain chemical processes
- Non-radioactive discharges in general to the Hamoaze
- Storage, treatment, recovery and disposal of non-radioactive wastes
- Pollution prevention from routine dockyard operations

Compliance assessment

We carried out an inspection of DRDL's Effluent Treatment Plant in September 2020. This was in response to its partial shutdown at the end of July. We reviewed the Operator's arrangements for ensuring that this shutdown did not affect compliance with the discharge requirements in the permit. We were satisfied that the situation was well-managed and that compliance was maintained.

We recently carried out a remote review of continuing arrangements that DRDL and HMNB have put in place to ensure compliance with their permit and approval respectively, during the response to the coronavirus pandemic. This was part of a wider review across all of the nuclear sites that we regulate. We are currently assessing the responses from DRDL & HMNB and will issue a RASCAR and a compliance letter, respectively, based on our conclusions.

Regulatory Position Statements

In response to the coronavirus pandemic, the Environment Agency issued a number of COVID-19 Regulatory Position Statements (RPS) - see www.gov.uk/government/collections/covid-19-regulatory-position-statements. These relaxed certain permit requirements where circumstances beyond the control of permit holders, caused by the response to the coronavirus pandemic, prevented permit compliance.

DRDL requested the limited use of these RPS, to which we agreed. In particular, environmental monitoring scheduled for April 2020 (only) was cancelled and accreditation testing of discharge flow monitoring equipment was delayed from June to September 2020. DRDL has not needed to use any RPS after September 2020.

HMNB has not needed to use any of the RPS.

Proposed variation to HMNB (Devonport) Approval

- We have been in discussion with HMNB about varying their approval, to allow a new disposal route for rainwater that collects in bunds under naval base effluent tanks. This would enable disposal of clean, or very slightly contaminated, water direct to river. Once we receive the application, we will formally consult with statutory consultees and LLC members, and the application documents will be available on the gov.uk website. In due course we will then consult on the draft outcome of our determination.

Other items of note

We commissioned additional reassurance environmental monitoring in late November 2020, to identify whether the temporary change in the pattern of DRDL's discharges to river had any impact. The results will be available in time for inclusion in our report to the July LLC.

We, along with colleagues based at offices local to Devonport, attended a remote Annual Review of Environment meeting in January 2021. We agreed to work more closely on issues such as sustainability, particular in the context of major infrastructure projects at the Dockyard.

In light of the LLC meeting being cancelled, we want to emphasise that we would be pleased to respond by email or phone to any questions raised by committee members or the public about our report.

Actions and points of clarification from previous meetings

None

Richard Lee

Lead Nuclear Regulator

Nuclear Regulation Group (South)

February 2021