

Devonport Local Liaison Committee Interim Brief

MARCH 2021



Executive Summary

This report provides an interim brief to members of the Devonport Local Liaison Committee (LLC) in place of the scheduled Jan 2021 meeting, which has been cancelled as a precaution against the spread of COVID-19.

The maintenance of safe and secure operations across the Devonport site has remained a priority. As a community within HMNB Devonport and the Devonport Royal Dockyard we continue to implement the measures required to manage the impact of COVID-19 and operate in line with Government guidance and wider good practice to protect the health and wellbeing of our workforce and anyone operating on our site.

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.

Cdre Peter Coulson ADC RN – Naval Base Commander

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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 Jan 2021 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 01 July – 31 Dec 2020.

The maintenance of safe and secure operations and the wellbeing of our staff have remained enduring priorities for the MOD, Royal Navy and Babcock throughout the reporting period. Measures to manage the impact of COVID-19 continue to be adopted. 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 continues to dominate the dockyard's Warships work programme, with five Type 23 frigates at various stages of their life extension upkeep periods within the Frigate Support Centre (FSC). An amphibious platform is currently in phase 2 of a 3 phased Optimised Support Programme. All projects within the Warships programme are proceeding with COVID-19 / social distancing controls in place along with stringent testing requirements.

Fleet time engineering has continued to support deployed and base-port platforms critical to our Customer's operational priorities.

2.2 Facility Update

HMNB Devonport and the Devonport Royal Dockyard are entering a once in a generation period of substantial investment which will see recapitalisation of the site to deliver support to the next generation of Royal Navy platforms. The facilities at the Devonport site represent a UK strategic asset and are critical to Royal Navy outputs in Devonport's roles as an Operating Base and Centre of Deep Maintenance for surface ships and submarines.

Babcock is working closely with the MOD and have developed a joint strategic plan for the site moving forward and split into three key epochs — the Short (2020-30), Medium (2030-40) and Long Term (2040+).

As part of the initial phases of the short-term significant investment continues across the site with multi-million-pound investment proposed for 20/21 and 21/22. 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, operational resilience and demonstrates the Devonport operators' ongoing commitment to invest in the site.

Other short-term investments include a programme of major infrastructure projects, focused on increasing the site's ability to support the Astute Class submarines and commence defueling of the decommissioned submarines, has begun. Babcock is working closely with the MOD and several strategic partners from the construction industry to deliver this programme of work which is centred on 5 Basin. Ground investigations works are nearing completion with temporary accommodation for the project teams being installed. Later this year, works to remove the existing building on 10 dock will begin. Babcock is also working with a range of local stakeholders to maximise the social value that this ~£1Bn investment programme can bring to the City.

Further details of the joint strategic plan for the site moving forward can be found in "One Devonport - A Blueprint for the Future".

2.3 Submarines Update

Progress on priority submarine projects continued throughout the second half of the year, during which time the on-site teams strictly followed government and corporate COVID-19 guidelines. Our business continuity planning has proven effective and as part of our COVID-19 safeguarding measures all employees who are able to work at home continue to do so, with only key production workers regularly attending site. The challenges that operating in this manner have presented have largely been addressed by local management actions. Whilst the benefits in areas such as reduced office space demand have been significant; to the extent that this form of "agile" working between site and home is being considered as a feature of our post COVID-19 working practices.

During the reporting period, we have again 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. In parallel, work has continued through this period on the deep maintenance programmes on T Class and V Class submarines.

Our primary focus remains on ensuring we are operating safely, compliantly and as efficiently as possible, with a whole (Submarine) Enterprise approach. In addition, our focus on the future and the preparations needed in readiness for the start of maintenance activities for the Astute Class submarines in Devonport have been encompassed within the Future Maritime Support Programme contract proposal. Due to commence in April, this is an important contract for the whole of Devonport Dockyard and a key enabler for the submarine support afforded to our Royal Navy and MOD Customers for the next five years

3 Safety Performance

3.1 Reportable Nuclear & Radiological Events

- Babcock
 - 14 International Nuclear & Radiological Event Scale events have been reported to the Regulators since the last LLC, 13 of which were below scale (Level 0) and assessed as of no safety significance. 1 rated at a Level 1 - Anomaly (Crane slew zoning protection trip).
- HMNB Devonport
 - No reportable events

3.2 RIDDOR (> 7 Day lost time events)

- Babcock
 - 19 x reportable occurrences (compared with twelve in previous six-month period) including:
 - injuries from handling, lifting or carrying resulting in strains and sprains
 - injuries associated with trips and falls
 - injuries from contact with hand tools
 - traffic accidents
- HMNB Devonport
 - 4 x reportable occurrences (compared with two in the previous six-month period) – none of which were sustained in relation to Naval base nuclear operations.
 - 2 sporting injuries, 1 cycling incident – fall from bicycle & 1 Slip / Trip / Fall incident.

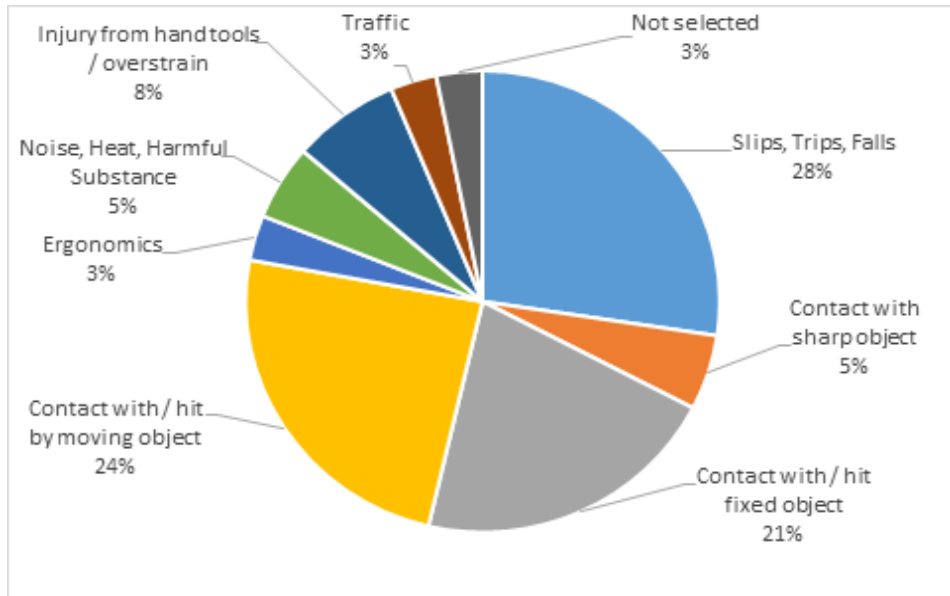
3.3 Accident Causation

- Babcock (see pie chart below)

The total number of accidents since the last LLC is 94. The biggest contributors to injury rates on site are:

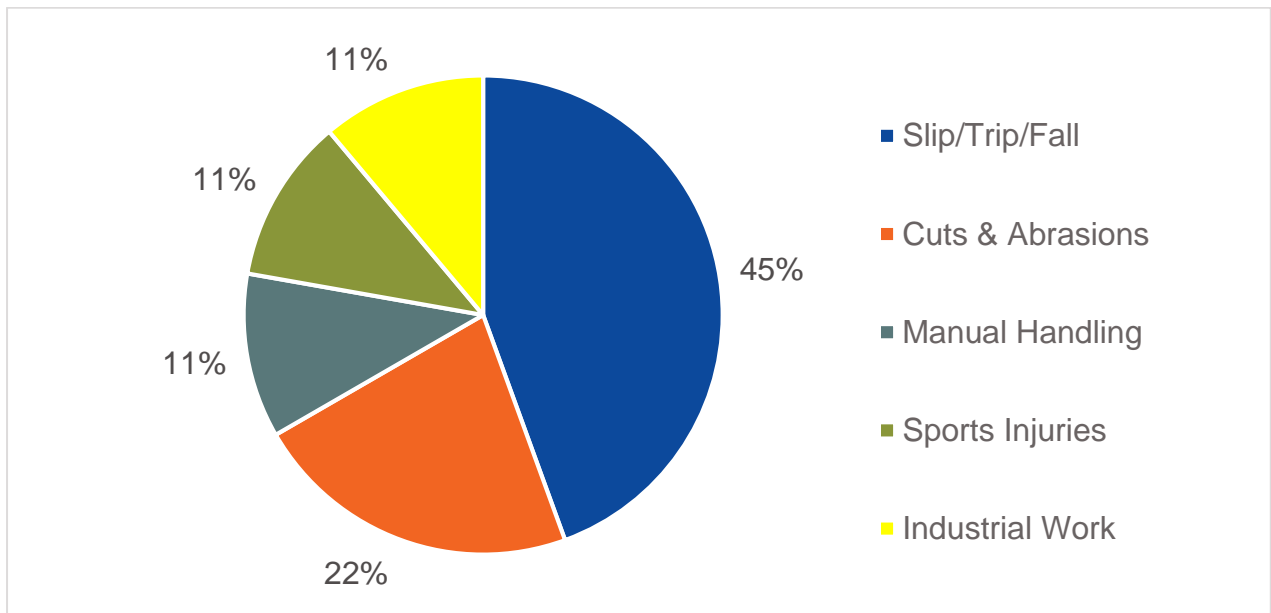
 - Hitting something fixed or stationary – protruding/unprotected fixtures, and spatial awareness issues.
 - Hit by moving, flying or falling objects had a major influence, the majority of these events are made up from injuries sustained from dropped tooling/items or foreign bodies in eyes (dust etc).
 - Slips, trips and falls, caused by facility conditions (raised edges, potholes, uneven surfaces, etc), or victim of other persons actions (housekeeping).
 - Injuries caused by manual handling/ergonomic issues also had a significant influence.

Babcock Accident Causation



- HMNB Devonport (See Pie chart below)
 - 9 NBC(D) injury accidents, involving NBC(D) personnel / infrastructure / representative sport excluding RIDDORs (compared to 11 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

- 98 False alarm calls in the period – 1 attendance by DSFRS to a submarine, false alarm smoke detector activation.

- Two attendances by DSFRS to fires. One in a waste lorry in South Yard, where the waste was emptied onto road and extinguished by fire service. Second in G004, light smoke discovered in building, but no sign of fire, the building was vented and declared safe by the fire service.
- Two attendances by DSFRS for rescues. One casualty on HMS St Albans, fire service assisted with casualty removal. Second casualty on HMS Bulwark, again fire service assisted with removal.
- Six fire exercises with DSFRS attendance, two driven for their own training purposes.

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. Gaseous discharges are only reported annually to the Environment Agency (EA) – therefore there is no reported data yet for 2020; this will be provided to EA by the end of Mar 2021. The gaseous returns for 2019 include the expected slight increase in tritium discharges to atmosphere associated with defueling activities, 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 July 2020 DRDL notified the EA that the effluent treatment plant used to process effluent with low levels of radioactivity prior to permitted discharge to the river had been taken out of service in order to replace saturated ion exchange resin in one of the treatment columns. No discharges were made to the river until the treatment plant had been replenished and set to work in November 2020. The EA carried out a site inspection in September 2020 and the inspector was satisfied that effluent generation and storage was being appropriately controlled. There was no environmental impact associated with this outage.

Radioactive waste discharge summary		2017	2018	2019	2020	Limit
Aqueous Discharges to Tamar	Tritium (GBq)	29	12	5	8	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	0.014	2
	Co-60 (GBq)	0.006	0.003	0.002	0.002	0.35
	Others (GBq)	0.082	0.076	0.062	0.043	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 Disposal of Contaminated Rainwater from HM Naval Base Devonport

The Naval Base has completed a review of the way in which it manages and disposes of rainwater which gathers in the sumps of the Naval Base effluent transfer system. Within the sumps the rainwater has the potential to become contaminated with very low levels of radioactivity. The review has recommended that in future the more appropriate disposal route will be via discharge to the river, as opposed to via the effluent treatment as the low levels of tritium present in the contaminated rainwater are not abated by the effluent treatment plant. In addition, there is a negligible environmental impact from such low-level discharges.

The Naval Base intends to apply to the Environment Agency (EA) for a variation to its existing radioactive waste disposal Approval and subject to agreement from the EA introduce the new disposal route in the Autumn of 2021.

3.7 Environmental Monitoring

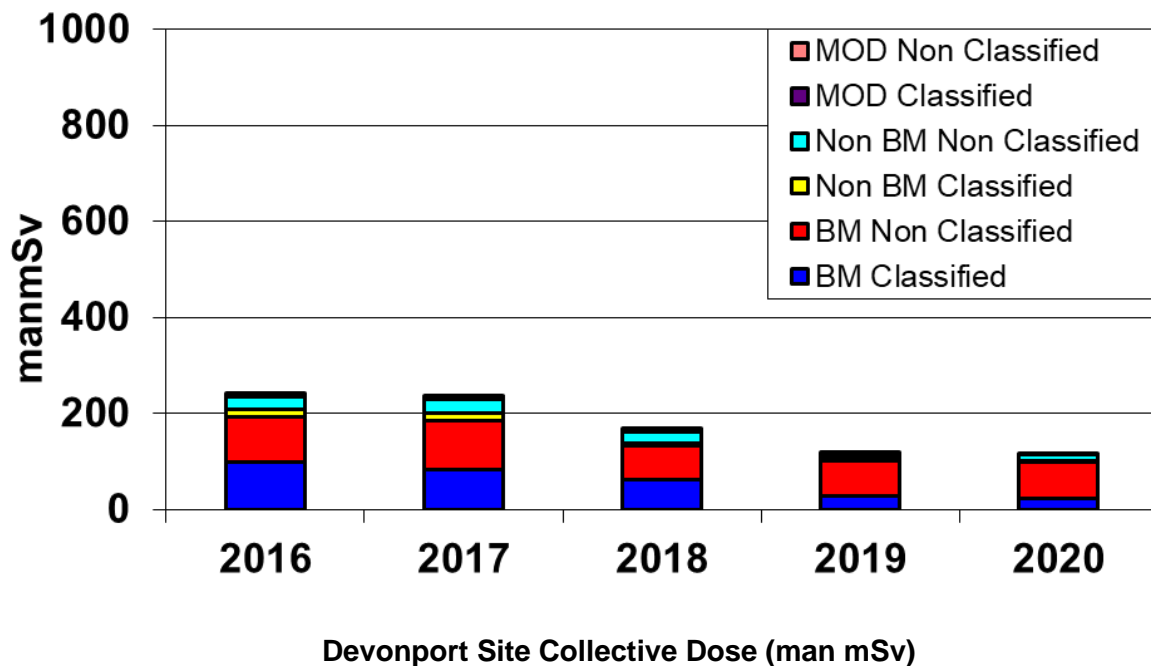
Marine environmental monitoring for radioactivity was carried out in January, September and October 2020. No cobalt-60 or tritium was detected in any samples and low levels of carbon-14 were measured in biota samples, within normal levels. One dose rate measurement was just above background and was attributed to naturally occurring radon daughter products.

3.8 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 31st December 2020 of 1.1 mSv in year (well below the legal annual limit (20 mSv) 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 – 41 scans have been completed in 2020. Of these, 12 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 and routine monitoring restarted in July.



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

Following the Prime Minister's announcement on 23 March 2020 and the subsequent provision of evolving national guidance, there are a number of measures we have taken to protect everyone working in our operations, including:

- Significantly reducing the number of those coming on site for work purposes (with as many as possible now working from home).
- Standing up teams dedicated to adjusting our operations in line with national guidance to maintain a safe working environment.
- Monitoring numbers of those on site to ensure the safety and security of our operations which has been proactively maintained at a safe level at all times.
- Introducing an asymptomatic testing programme for our employees working on critical projects, with dedicated facilities on site to deliver quick results.

Working arrangements are regularly reviewed against Government and Regulator guidance for COVID-19 mitigation and revised where required. A live dashboard has also been 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 The Nuclear Emergency Response Organisation

Prompt action was taken at the start of the pandemic to safeguard the site Nuclear Emergency Response Organisation (NERO) against the impact of COVID-19 and NERO capability has been maintained. Following the first lockdown the viability of the NERO has continued to be monitored on a frequent basis to ensure sufficient site personnel are confirmed available to respond if required.

NERO response facilities have been risk assessed and mitigatory measures, such as screens, have been put in place to make them COVID-19 safe and available for use in the event of an emergency.

As detailed in the July 20 LLC brief a Level 1 demonstration exercise (site only) was planned for 14 October 2020. However, this exercise was cancelled due to increased COVID-19 restrictions. A programme of additional assurance activities was agreed with regulators and is being implemented as permissible with COVID-19 restrictions. Dates for future exercises are being determined in consultation with regulators and external support agencies.

A routine communications exercise was successfully conducted on 14 December 20 with no significant issues identified.

In addition, meetings have been held between emergency planners from the Site (DRDL and MOD), Plymouth City Council and the Emergency Services on a fortnightly basis to provide mutual assurance of each other's response capability. The NERO capability has been maintained throughout.

Next LLC Meeting

The date and format of the next LLC will be kept under review in accordance with Government advice in relation to COVID-19. It is anticipated that the next meeting will be scheduled in late summer 2021. A decision on the 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.

Annex - Plymouth City Council report

UPDATE REPORT FOR DEVONPORT LOCAL LIAISON COMMITTEE



Devonport Off-Site Emergency Plan (DOSEP) and COVID-19

Plymouth City Council's Civil Protection Service continues to maintain the off-site emergency planning requirements as detailed in the Radiation (Emergency Preparedness and Public Information) Regulations (REPPIR) 2019.

As reported in July 2020, the Devonport Off-Site Emergency Plan (DOSEP) was subject to a full review in line with the revised REPPIR. Since publication in May 2020, DOSEP version 7.0, has been revised with minor amendments requested by the operational partnership. These reflect partner agencies' organisational changes.

Throughout the COVID-19 pandemic, fortnightly meetings have been held with the MOD, Babcock International and a representative from the blue light services. This provides a useful forum for the lead agencies to ensure a shared situational awareness, identifying potential COVID-19 impacts on the Devonport Off-Site Emergency Plan in order that appropriate mitigation measures can be put in place.

Stable Iodine Distribution

REPPIR 2019 requires ongoing consideration as to how members of the public are protected from the effects of a nuclear emergency and the Public Information Booklet published in June 2020 provides details of these protective actions.

Weekly meetings are held between Plymouth City Council and the operators to confirm the Stable Iodine distribution arrangements, including details of any planning applications received within the Detailed Emergency Planning Zone (DEPZ), which may affect the off-site planning arrangements.

One such development is the Barne Barton regeneration programme, a multi-million pound project involving the redevelopment of the area. Plymouth City Council are currently working with the developers and Registered Social Landlords, to ensure that the Public Information Booklet is delivered to the new houses when built. Part of this work will also include updating the Stable Iodine delivery plans to accommodate the new community layout.

Duties to Visitors to the Detailed Emergency Planning Zone (DEPZ)

REPPIR 2019 outlines that arrangements should be in place to ensure that advice and information is made available to regular visitors to the area. Initial project plans are being developed to put in place a mechanism to share relevant information with Registered Social Landlords and social care staff. This will ensure people working in the area have access to the correct prior information in line with that provided to people living in the vicinity and contained within the Public Information Booklet. Once this has been successfully rolled out, we will look to expand this scheme to other agencies who have staff working within the area, such as the Post Office.

We have worked closely with the dockyard around COVID-19 and echo the comments elsewhere in the document from ONS referencing how well they have coped with this significant challenge. While there have been some isolated incidents in settings within or linked to the dockyard, we have worked closely to ensure that there has been very minimal risk to anyone in the general population. Unfortunately,

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these figures do show up in the local area figures, but I can absolutely confirm that there is an understanding of the population risk levels when COVID-19 decisions are made.

I can confirm that there have been no notifications of any health-related clusters which could have associations with the dockyard.

Ruth Harrell
Director of Public Health
Plymouth City Council