



Classification: UNCLASSIFIED



Devonport Local Liaison Committee Interim Brief

September 2021





Executive Summary

This report provides information about key activities across Devonport Royal Dockyard and HMNB Devonport over the last six months and serves as an interim brief to members of the Devonport Local Liaison Committee (LLC) in place of the scheduled September 2021 meeting. This was due to be held in person, but cancelled as a precaution against the spread of COVID-19 following the recent increase in cases across Devon and Cornwall.

Firstly and most importantly, our thoughts and sincere condolences remain with all those affected by the tragic events in Keyham last month and we continue providing various forms of support to our workforce as well as maintaining contact with community leaders across the city.

The provision of safe and secure operations across the Devonport Royal Dockyard and Naval Base remains a priority. As a community we continue to implement the measures required to positively manage the impact of COVID-19, and operate in line with Government guidance and wider good practice to protect the health and wellbeing of all those working within our operations.

Paul Foster, MD Devonport Royal Dockyard Limited



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1 Background

The LLC provides a forum to communicate and discuss with representatives of members of the public Devonport cross-site nuclear operations and safety issues, 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. Usually, these 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, to reduce the risk of spreading COVID-19, the September 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 period 01 January – 31 July 2021.

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. 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 Facility Update

Babcock continues to work closely with the MOD to develop a joint strategic plan for the site to 2030 and beyond.

There is ongoing significant investment across the site in areas such as:

- 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.

An extensive portfolio of short and long term infrastructure projects is underway, (see Figure 1 below). These projects, which are a combination of MOD and Capital Expenditure (CAPEX) funded activities, will secure the site's ability to support the Royal Navy through to 2050, and includes new capabilities to support the Astute Class SSN and to address the defueling of the retired SSNs currently stored afloat in 3 basin.

Taken together, this represents an important investment in Devonport's infrastructure and is the key to increasing the number of submarine projects able to be undertaken in parallel in the dockyard. This will secure hundreds of new skilled and professional jobs for the City of Plymouth

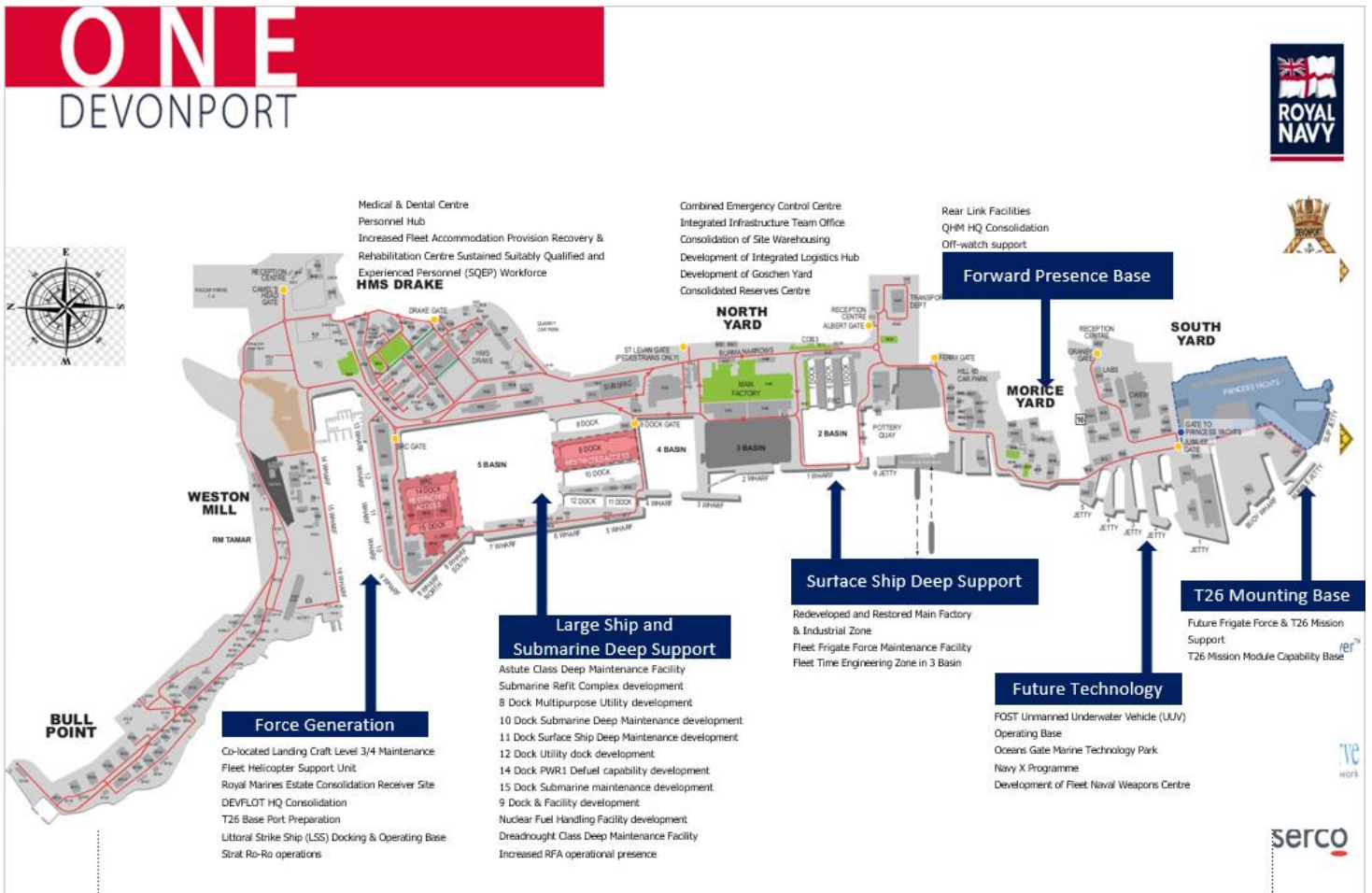


Figure 1: Scheduled and Envisaged Infrastructure Projects

2.2 Submarines Update

Progress on priority submarine projects continued throughout the first half of the year, whilst the on-site teams strictly followed government and corporate COVID-19 guidelines. Our business continuity planning has proven effective, but in the spirit of the COVID-19 restrictions, those employees who have been able to work from home during this period, have been enabled to do so, with only key workers regularly attending site. The challenges that operating in this manner have presented have largely been addressed by local management actions. 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 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.



Much work continues 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. This is an important contract for the whole of Devonport 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

10 International Nuclear & Radiological Event Scale events have been reported to the Regulators in the reporting period, all of which were below scale (Level 0) and assessed as of no safety significance. DRDL also reported one event to the Environment Agency using a Schedule 5 Notification for clean water spill into radiologically controlled area. There was no discharge to the environment and no additional radioactive waste was generated.

HMNB Devonport

1 International Nuclear & Radiological Event Scale event has been reported to the Regulators, below scale (Level 0) and assessed as of no safety significance.

3.2 RIDDOR & > 7 Day lost time events

Babcock

5 RIDDOR reportable accidents of greater than 7 days and 3 dangerous occurrences, totalling 8 RIDDORs were reported in the first 6 months of 2021, a decrease from the previous period.

Events include:

- 3 x dangerous occurrences (articulated steam pipework burst, Damaged/Ruptured gas main during excavation works and a test fitting sheered whilst under pressure)
- 5 x reportable accidents:
 - 1 injury associated with a fall from height
 - 2 injuries from contact with hand tools
 - 1 crush injury to finger
 - 1 strain injury



HMNB Devonport

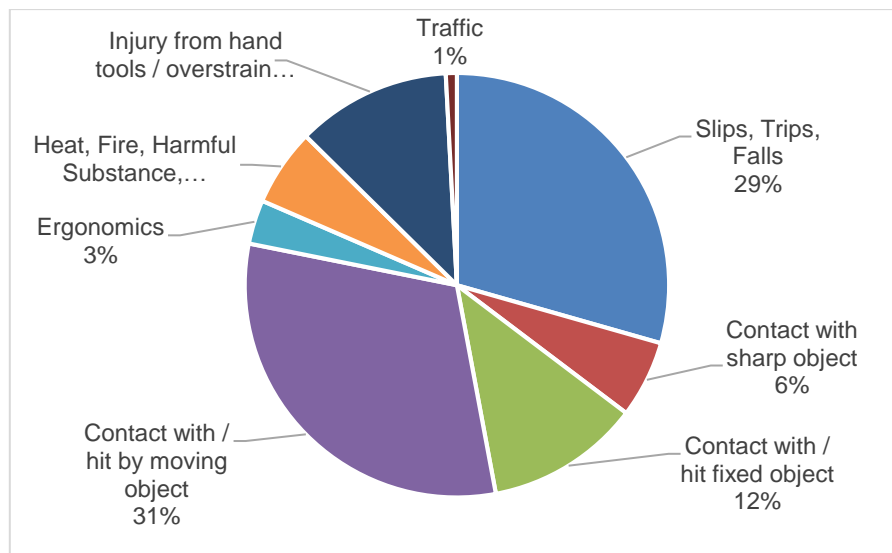
2 x reportable occurrences (compared with four in previous period) – none of which were sustained in relation to Naval Base nuclear operations.

- 1 head injury
- 1 Slip / Trip / Fall incident.

3.3 Accident Causation

- **Babcock** (see Pie chart below)
The total number of accidents in the first 6 months of 2021 was 119. 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 -- 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).

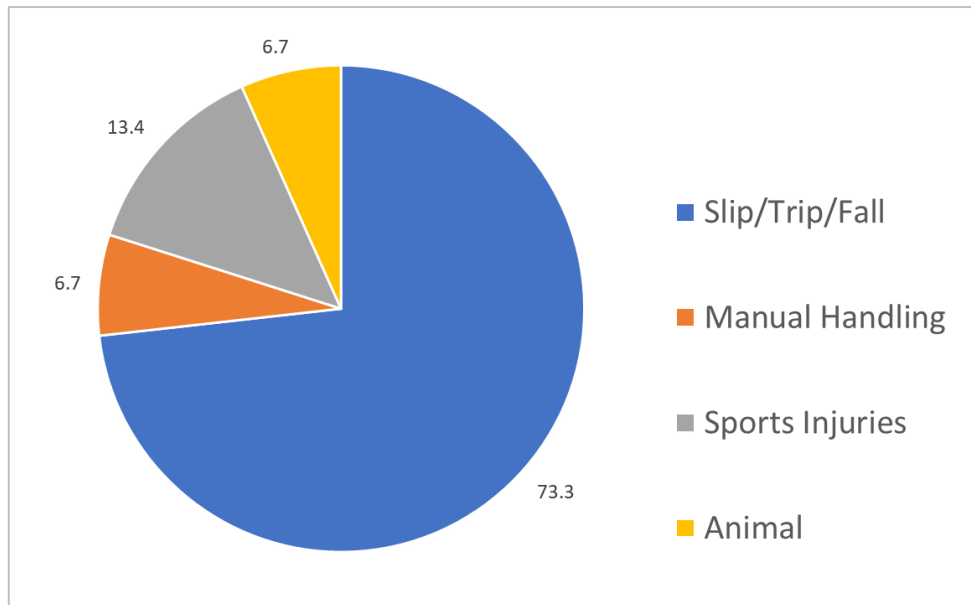
Babcock Accident Causation





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

HMNB(D) Accident Causation (%)



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

- 89 false alarm calls in the period with no attendance by DSFRS
- 3 attendances by DSFRS to confirmed fires. One in a waste lorry in South Yard (reported in the last interim report). Second was an electrical fire in N190 Lowden Building and the third occurred in N009 computer suite caused by an overheated air conditioning unit.
- 1 fire exercise with DSFRS attending for training purposes.

3.5 Radioactive Waste Disposals

Routine radioactive waste disposals continue to take place, all well below permitted limits. The following table details the annual discharges of liquid and gaseous radioactive wastes by DRDL. Gaseous discharges are only reported annually to EA – hence no reported data yet for 2021; this will be provided to EA by the end of March 2022. 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 June 2021 DRDL reported one event to the Environment Agency using a Schedule 5 Notification for the discharge of clean water into a radiologically controlled area bund. There was no discharge to the environment and no additional radioactive waste was generated.



DRDL Radioactive Waste Discharge Summary		2018	2019	2020	Rolling 12 months to June 2021	Annual Limit
Aqueous Discharges to Tamar	Tritium (GBq)	12	5	8	10	700
	Co-60 (GBq)	0.01	0.002	0.002	0.001	0.8
	C-14 (GBq)	0.03	0.03	0.02	0.02	1.7
	Others (GBq)	0.03	0.003	0.005	0.002	0.3
Aqueous to Sewer	Tritium (GBq)	0.047	0.040	0.014	0.010	2
	Co-60 (GBq)	0.003	0.002	0.002	0.002	0.35
	Others (GBq)	0.076	0.062	0.043	0.041	0.65
Gaseous	Tritium (GBq)	0.367	1.73	0.842	Discharges remain under rolling quarterly notification levels	4
	C-14 (GBq)	0.315	0.250	0.200		66
	Ar-41(GBq)	0.009	0.005	0.009		15
	Beta	0.00002	0.00002	0.00002		0.0003
	Particulate (GBq)					

3.6 Disposal of Trace Contaminated Rainwater from HM Naval Base Devonport

As reported in the last interim brief to the LLC, the Naval Base has applied to the Environment Agency (EA) for a variation to its existing radioactive waste disposal Approval. The consultation period has closed and a separate engagement with interested parties was held on 9 September 2021. The Environment Agency’s decision is expected later in 2021.

3.7 Environmental Monitoring

Marine environmental monitoring for radioactivity was carried out in January and April 2021. No cobalt-60 or tritium was detected in any samples and low levels of carbon-14 were measured in biota samples, within normal levels. Environmental monitoring was also carried out in July 2021 and the results from this survey will be reported in the next update to the LLC, when sample analysis results are available. The surveys continue to demonstrate that Devonport is a site of low radiological significance. The Annual Report for 2020 surveys is available on the DRDL website.

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 July 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 2020.



The DRDL Dosimetry Service provides chest, whole body monitoring and internal dosimetry assessment services – 25 scans have been completed in 2021. Of these, fifteen were precautionary post incident monitoring with no positive intakes being detected. The whole-body monitoring service has been available for routine and incident monitoring throughout the COVID-19 restrictions.

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

As previously briefed, prior to the announcement by the Prime Minister on the 23rd March 2020 DRDL opened the Devonport Accident Control Centre, the first time it has been used for a real response, and established a COVID 19 Strategic Cell and a Business Continuity Cell. Its key purpose was to monitor national guidance and develop site policies and adjust DRDL's activities to ensure the safety and security of operations, the safety of its workforce and the community, and to progress defence priority projects for the safety of the nation.

Staff absences have been monitored throughout to ensure DRDL remained Safe and Secure and maintained an adequate Nuclear Emergency Response Organisation (NERO) at all times. The Business Continuity teams examined all key areas and developed resilience to ensure Safe and Secure, and the NERO could be maintained if impacted.

The measures taken range from physical site adjustments, asymptomatic testing for access to key areas, working from home, and an Immediate Action Drill to identify and isolate any potential 1st order contacts. This is in addition to the standard measures seen across the world of hands, face, space and fresh air.

The Dockyard Liaison Group, chaired by DSFRS and attended by DRDL, MOD and Plymouth City Council have met fortnightly to provide mutual assurance of the adequacy of staffing of both the on and off site plans. The DSFRS Chair providing a direct link into the Local Resilience Forum Tactical Coordination Group and Operational Incident Cell meetings to provide immediate notification to the Site had the responses been compromised by staffing issues.

5 The Nuclear Emergency Response Organisation

Prompt action was taken to safeguard the site 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.

The Site conducted its Level 1 demonstration exercise on 30th June 2021, which was internally assessed to be an adequate demonstration. The response was particularly successful considering it was the first exercise conducted since 2019, illustrating the robustness of the arrangements. It should be noted that COVID 19 adjustments made to the emergency arrangements have allowed them to be safely implemented at all times for real. The restriction



on exercising was necessary in order to limit the numbers of additional exercise directing staff and assessors required to conduct an exercise.

Despite all the COVID measures implemented, the exercise scope had to be reduced as the Forward Command Post (FCP) could not be safely demonstrated with the additional exercise control staff. An FCP exercise in the Autumn / Winter is being explored, COVID allowing. All of the objectives, with the exception of the cascade call-out, were successfully demonstrated. The Cascade call-out process did not contact a number of internal responders due to an update to the pager contact details not being reflected in all documentation. The cause was identified and procedure updated immediately after the exercise. A further test of the cascade call-out system will be conducted to prove this process to the Regulators. It should be noted that the cascade call-out of external agencies was unaffected by this issue.

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. 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

UPDATE REPORT FOR DEVONPORT LOCAL LIAISON COMMITTEE



Please see below key points:

- Stable Iodine Tablet Distribution Plan has been revised in full and is now jointly held by the MoD & Plymouth City Council
- The Devonport Offsite Emergency Plan (DOSEP) Annual Review meeting was held between the Operators and Plymouth City Council in April 2021. This meeting included the signing off of the updated Stable Iodine Tablet distribution plan
- In accordance with DOSEP, the Annual Responder Competence Review is in progress. This gives Plymouth City Council the assurance that multi-agency partners and other stakeholders have appropriately trained and suitably equipped staff to respond to and manage an incident emanating from the Devonport Site
- Preliminary planning for the validation of the Devonport Offsite Emergency Plan is underway. This will culminate in an exercise to test the offsite arrangements in the middle of 2022 and will be assessed by the Office of Nuclear Regulation in accordance with the REPP19 legislation
- The Director of Public Health can confirm that, as previously described, monitoring for specific diseases (relevant cancers for example) is in place and there have been no concerning patterns identified

Ruth Harrell
Director of Public Health