

Devonport Local Liaison Committee Report

10 March 2022

September 2021 - March 2022

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

We have resumed attendance at site on a limited basis, primarily for inspections. We attend most meetings remotely. We started an inspection on solid waste management arrangements in February and this will be completed in March. 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 with these other regime is managed by teams from our Devon, Cornwall and Isles of Scilly (DCIS) Area, which has its main office in Exeter.

Compliance assessment

We completed our report into the immediate issues identified during our inspection of the Dump Hold Tanks in the Void Space below the Submarine Refit Complex and confirmed one non-compliance. We are continuing our investigation into the matter of aqueous effluent being left in those tanks since 2009, but will produce a separate report. That will identify additional non-compliances.

DRDL notified us in November 2021 of a spill of about a litre of liquid that entered the surface water drains. We received their report on the incident in February but had to ask for further information on the potential impact on the environment. We identified three non-compliances with the permit and require DRDL to complete various actions to minimise the possibility of recurrence.

We started a compliance inspection on solid waste management in February. We did not identify any non-compliances but the second part of the inspection will not take place until the end of March.

Variation to HMNB (Devonport) Approval

- We completed the determination of this application and issued a consolidated approval on 8 March 2022. The new approval, an updated Compilation of Environment Agency Requirements (CEAR) and our Decision Document are available at the web address below and we would be pleased to respond to any questions arising from this:

[Application to vary the Radioactive Substances Approval EPR/LB3730DK at Her Majesty's Naval Base \(HMNB\) Devonport, Plymouth, PL2 2BG. - Environment Agency - Citizen Space \(environment-agency.gov.uk\)](#)

Other items of note

We attended the Annual Review of Environment (ARoE) and the Annual Review of Safety (ARoS) in January. We are currently developing our site inspection plan for 2022/23 for both DRDL and HMNB.

In light of the in-person 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.

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Actions and points of clarification from previous meetings

None

Richard Lee

Lead Nuclear Regulator

Nuclear Regulation Group (South)

Environment Agency

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