Classification:UNCLASSIFIED

Devonport Local Liaison Committee Interim Brief

March 2022

Executive Summary

This report provides information about key activities across Devonport Royal Dockyard and HMNB Devonport over the last six months and includes an update from the Plymouth City Council (PCC) Civil Protection team. The report serves as an interim brief to members of the Devonport Local Liaison Committee (LLC) in place of the scheduled January 2022 meeting which was cancelled as a precaution against the spread of COVID-19.

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.

This interim report will hopefully be the last one produced in lieu of a face to face meeting and I look forward to reconvening the LLC in person at our next meeting scheduled for 23rd June 2022 at the Devonport Guildhall.

Cdre Peter Coulson ADC RN – Naval Base Commander

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Plymouth City Council report from Civil Protection team

1 Background

The LLC provides a forum to communicate and discuss with representatives of members of the public issues relevant to Devonport nuclear operations and safety, including the maintenance and exercising of the Nuclear Emergency Response Organisation (NERO). Although there is no legal requirement to hold such meetings they are regarded as good practice. Usually, these biannual meetings are 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 January 2022 meeting of the LLC was cancelled. This briefing document has therefore been produced to provide LLC members with an update of operations and safety performance on the Devonport site and includes a report from the PCC Civil Protection team on planning for Exercise Short Sermon 22.

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 key site operations

2.1 Surface Ships Update

Type 23 frigate support continues with five platforms at various stages of their life extension upkeep periods. 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 controls in place. Fleet time engineering has continued to support deployed and base-port platforms critical to RN operational priorities.

2.2 Facility Update

A significant programme of infrastructure investment is now underway in Devonport, preparing the dockyard to meet the future needs of the Royal Navy's warship and submarines programmes. The upgrade programme will touch most areas of the site over the next decade and includes:

- Building improvements/change of use,
- Amenity and office space,
- Electrical infrastructure, and
- Dock readiness.

In addition to the capability that this brings to the site, it also supports our continuing drive to enhance safety and operational resilience, whilst demonstrating 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.

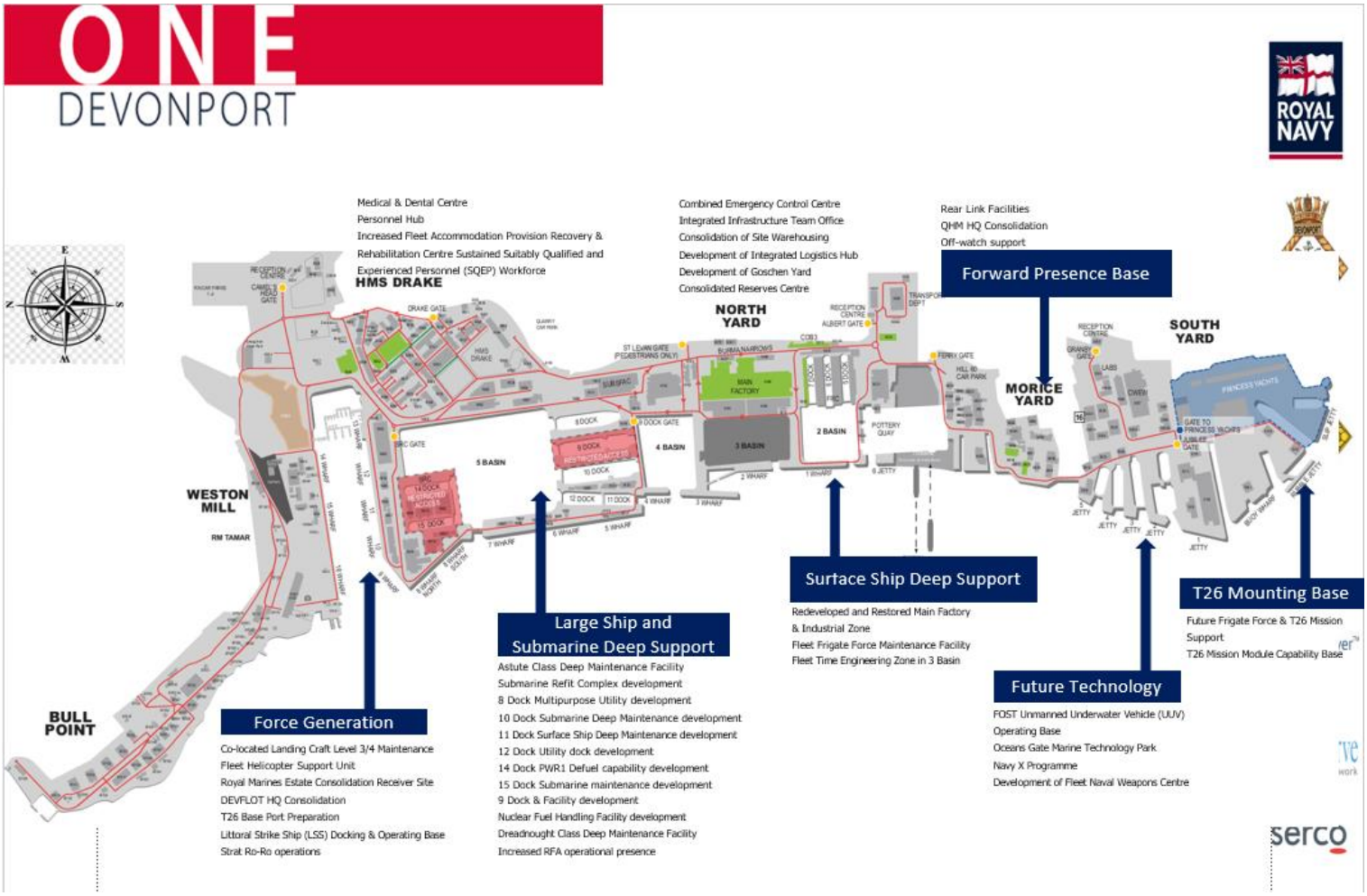


Figure 1: Scheduled and Envisaged Infrastructure Projects

2.3 Submarines Update

Progress on priority submarine projects has continued throughout the second half of the year. The business maintained a prudent response to the government relaxation of the National COVID-19 guidelines; retaining sensible precautions to ensure the project priorities did not contribute to the site, or community infection rates and in this we remain successful. In delivering our business outputs, "agile" working between site and home is an increasing feature of our post COVID-19 working practices.

Planning and preparations continue for the increase in the volume of support we provide to the Royal Navy's submarines. This incorporates not just the maintenance planning, but also facilities upgrades and readiness, and the recruitment and development of a larger workforce of suitably qualified and experienced personnel. This growth offers genuine opportunity to the local community and the city.

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. In parallel, work has continued at pace on the maintenance programmes on T Class and V Class submarines, all of which have achieved major milestones in this reporting period.

3 Safety Performance

3.1 Reportable Nuclear & Radiological Events

Babcock

Two International Nuclear & Radiological Event Scale (INES) events were reported to the Regulators since the last LLC, both were below scale (Level 0) and assessed as of no safety significance. The events involved:

- abandoned gas bottles in 11 Dock,
- the routine test of Nuclear Accident warning sirens failed to occur on 22 Nov 21.

HMNB Devonport

There were no INES event to report.

3.2 Reporting of Injuries, Diseases and Dangerous Occurrences Regulation (RIDDOR) & > 7 Day lost time events

Babcock

There was an increase in the number of hours worked from the previous 6 months, from 7.2 million hours worked to 7.7 million.

- Babcock reported 5 RIDDOR reportable accidents and 1 Specified Injury – totalling 6 in the reporting period (a decrease from 8 accidents in the previous period). Two of these accidents occurred on the Licensed Site. The accidents comprised:
  - injuries associated with trips and falls,
  - cuts / soft tissue injury,
  - injuries from strains during moving, handling, lifting or carrying.

HMNB Devonport

The Naval Base reported two occurrences (same number as the previous period) – one of which was sustained on the Naval Base Nuclear Authorised Site (Tidal X Berth).

- HP air hose rupture on Tidal X berth facility.
- 1 Slip / Trip / Fall incident leading to fracture of bone in hand.

3.3 Accident Causation

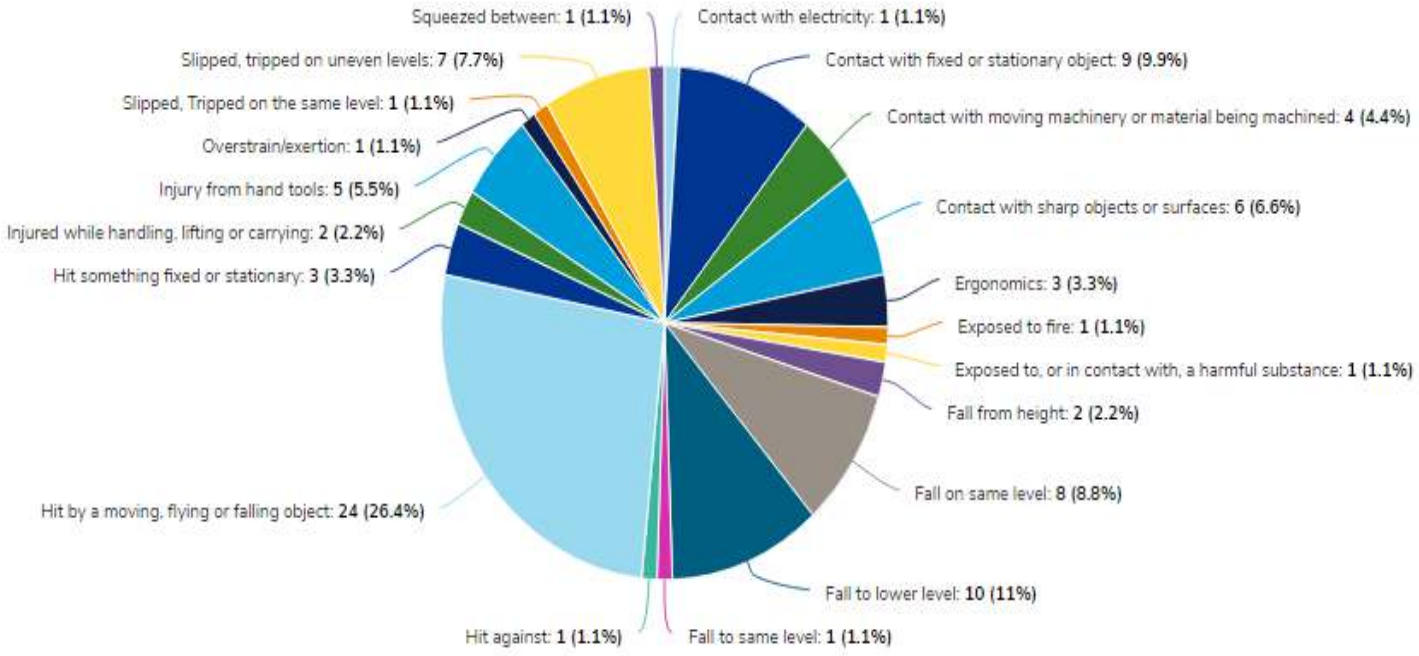
Babcock (see Figure 2 below)

The Accident Frequency Rate (AFR) for a rolling twelve month period was 1.38 per 100,000 hours worked a decrease from 1.52 on the 1st Jul 2021.

There were 90 accidents in total during the reporting period (down from 119 in the previous period). The biggest contributors to injury rates on site are through:

- being 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),
- falls to lower levels,
- slips, trips and falls, split between facility condition (raised edges, potholes, etc) and victim of other persons actions (housekeeping).

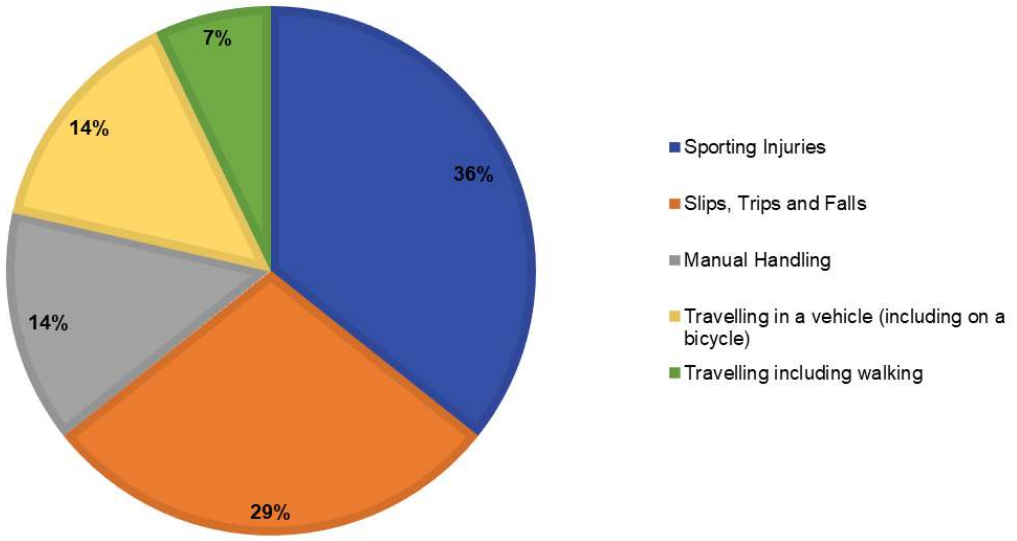
Babcock Accident Causation - Figure 2



HMNB Devonport (See Figure 3 below which covers period 01 Jul to 31 Dec 21)

- There were 14 NBC(D) injury accidents recorded in the reporting period, involving NBC(D) personnel / infrastructure / sport excluding RIDDORs (compared to 15 last period): None of the accidents were attributable to Naval Base nuclear activities.

HM Naval Base Accident Causation - Figure 3



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

The following number of fire alarms were raised in the reporting period:

- 134 alarms that did not requiring attendance by DSFRS,
- 1 alarm from a confirmed fire due to an electrical fault in shower cubicle – which did have DSFRS attendance,
- 2 alarms for confirmed fires which did not requiring DSFRS attendance – one involved a towel catching fire on an electrical heater in living accommodation and the other fire involved a toilet extraction fan overheating in office accommodation,
- 1 alarm raised as part of a fire training exercise with DSFRS attending for training purposes.

3.5 Radioactive Waste Disposals

All routine radioactive waste disposals during the period were conducted well within permitted limits. Table 1 below details the annual discharges of liquid and gaseous radioactive wastes by DRDL.

In November 2021 DRDL reported an event to the Environment Agency for the loss of approximately 1 litre of water containing traces of radioactivity to a road drain.

Table 1 - Radioactive waste discharge summary		2017	2018	2019	2020	2021	Limit
Aqueous Discharges to Tamar	Tritium (GBq)	29	12	5	8	11	700
	Co-60 (GBq)	0.02	0.01	0.002	0.002	0.001	0.8
	C-14 (GBq)	0.11	0.03	0.03	0.02	0.03	1.7
	Others (GBq)	0.02	0.03	0.003	0.005	0.003	0.3
Aqueous to Sewer	Tritium (GBq)	0.052	0.047	0.040	0.014	0.008	2
	Co-60 (GBq)	0.006	0.003	0.002	0.002	0.001	0.35
	Others (GBq)	0.082	0.076	0.062	0.043	0.032	0.65
Gaseous	Tritium (GBq)	0.330	0.367	1.73	0.842	0.100	4
	C-14 (GBq)	16.930	0.315	0.250	0.200	0.170	66
	Ar-41(GBq)	0.006	0.009	0.005	0.009	0.002	15
	Beta Particulate (GBq)	0.00002	0.00002	0.00002	0.00002	0.00001	0.0003

3.6 Disposal of Trace Contaminated Rainwater from HM Naval Base Devonport

As reported within the previous LLC interim report the Naval Base has applied to the Environment Agency (EA) to vary the manner in which trace contaminated rainwater is disposed of. Following public consultation the EA granted the variation (effective from 08 Mar 2022) subject to the completion of a small number of facility improvements which the Naval Base aims to complete in the near future before adopting the new disposal arrangements.

3.7 Environmental Monitoring

Marine environmental monitoring for radioactivity was carried out in January, April, July and October 2021. No cobalt-60 was detected in any samples and low levels of carbon-14 and tritium were measured in biota samples, within normal levels. Environmental monitoring was also carried out in January 2022 and the results from this survey will be reported at the next LLC meeting. The surveys continue to demonstrate that Devonport is a site of low radiological significance.

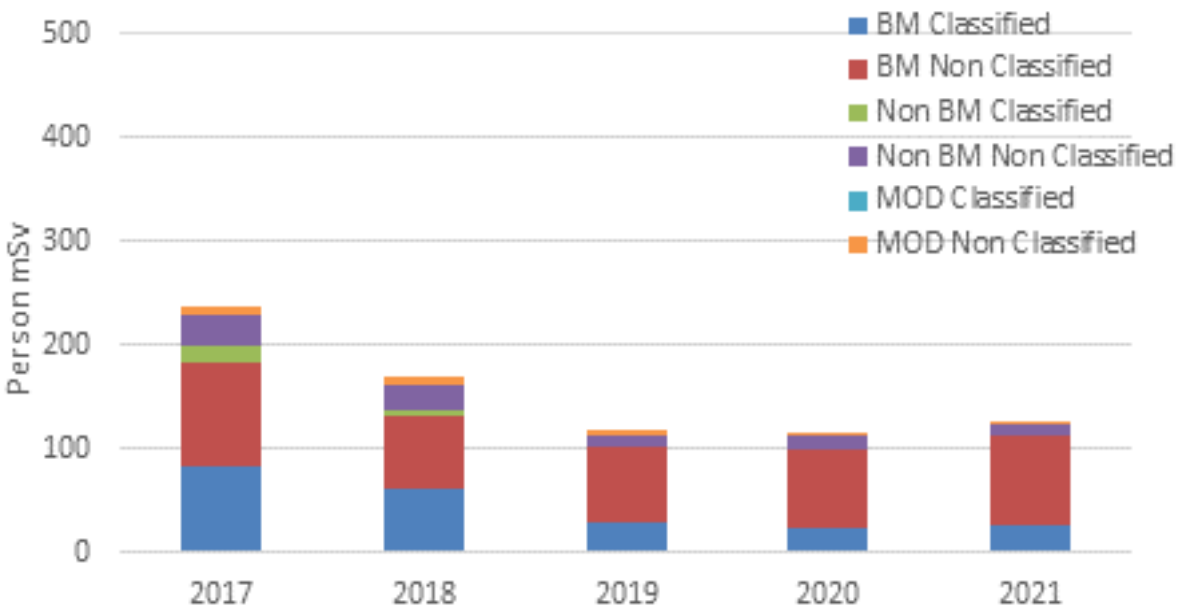
3.8 Dosimetry

The Naval Base and Babcock are committed to the principle of keeping any radiation doses to which people are exposed to “As Low as Reasonably Practicable” (ALARP). Figure 4 below

shows the total annual radiation dose accrued on the joint Devonport site for the last 5 years. Radiation doses to individual members of the workforce remain low – with the highest dose to an individual during 2021 being 1.3 mSv which is well below the annual limit for classified workers.

The Babcock dosimetry service provides chest, whole body monitoring and internal dosimetry assessment services – 40 scans have been completed in 2021. Of these, sixteen were precautionary post incident monitoring with no positive intakes being detected. In addition a total of 5 tritium in urine samples were also taken and all were below detectable threshold.

Annual Total Radiation Dose Accrual on the Devonport Site – Figure 4



4 Site mitigation adopted for COVID-19

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 (NERO)

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 mitigation 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 previously reported the Site conducted a 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. The demonstration of the Forward Command Post (FCP) was removed from the exercise scope because it was not possible to conduct the exercise and maintain social distancing due to the number of additional exercise and directing staff that would have been required. As a consequence an FCP exercise was conducted on 9th December 2021 to demonstrate those elements which could not be undertaken due to COVID constraints in June. This was assessed to be an adequate demonstration. As always there were learning points identified which include; re-establishing the Site's programme of emergency response drills, and the requirement for a review of the intervention process to streamline the accident scene entry arrangements.

On the 22nd September 2021 the emergency arrangements were initiated in response to a Gas Bottle incident on-Site. Whilst not a nuclear / radiological incident the response proved the emergency arrangements to also be adequate for conventional events.

Next LLC Meeting

It is intended that the next LLC meeting will take place as a live meeting on Thu 23rd June 22 at 10 am and hosted at the Devonport Guildhall, Devonport.

If any member of the LLC has any questions regarding the content of this brief, please send to Mr Luke Langsford (luke.langsford100@mod.gov.uk) interim secretary of the LLC.

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Annex

UPDATE REPORT FOR DEVONPORT LOCAL LIAISON COMMITTEE

Exercise Short Sermon 2022 - A modular exercise of the Devonport Off-Site Emergency Plan (DOSEP)

The Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPIR) requires the off-site plan owners to test their planning arrangements every three years either as a single exercise or in a modular format.

In previous years, including the last exercise in September 2019, Plymouth City Council and its partners adopted the single test approach, with a large-scale multi-agency exercise, taking place during the course of one day. However, over the last 12 months, Plymouth City Council (PCC) have been working closely with the Office for Nuclear Regulation to develop a modular approach to exercising the off-site plan, which we believe will focus minds on challenges very much related to responding to a radiation emergency in the very unlikely event that an incident occurs.

The modular format permits the Office for Nuclear Regulation to take account of evidence drawn from real-time emergencies and events, in the period since the onset of the COVID-19 pandemic in February 2020. The evidence we have provided includes the regional response to the Covid19 Pandemic, the impact of Brexit and the arrangements which were put in place for the successful delivery of the G7 summit in Cornwall last year.

The exercise modules are due to take place in May, June and September and will cover:

- the initial actions from the point of the off-site nuclear emergency declaration,
- warning and informing members of the public in the exercise area,
- Public Urgent Protective Actions & Health Protection,
- establishing a Science and Technical Advice Cell (STAC),
- issuing Radiological Information to off-site Responders,
- recovery,
- radiological monitoring.

By developing the exercise in this format, Plymouth City Council and its partners can examine and review the response and recovery processes at the local community level, allowing for a clear evaluation of the off-site emergency plan which in turn will ensure learning from all modules is incorporated into our future planning arrangements.

Debs Brooker-Evans
Civil Protection Service Manager