

Devonport Local Liaison Committee Report

20 January 2023

July 2022 - January 2023

Introduction

This report covers our nuclear 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 Nuclear Regulation Group (NRG) South, which is based in Wallingford in Oxfordshire, although individually they are based in Exeter.

Contact Details

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Attendance at site

We now regularly visit the site, largely at pre-Covid frequencies, but still take part in some meetings remotely. We carried out an inspection of HMNB Devonport's new arrangements for disposal of potentially contaminated rainwater in November. We maintain 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.

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 other regulatory regimes. These include:

- 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 regimes is managed by teams from our Devon, Cornwall, and Isles of Scilly (DCIS) Area, which has its main office in Exeter. We would be pleased to provide contact details if anyone has queries about these other regulatory regimes.

Compliance assessment

We carried out a compliance inspection of HMNB Devonport's new arrangements for managing potentially contaminated rainwater that collects in sumps under three effluent tanks on the Tidal X-Berths. We were satisfied those arrangements were sufficient to meet the requirements of the approval. We noted good practice in preparation for first use of the new disposal route. We recommended that the criteria used for assessment of non-radiological parameters should be clearer.

There was an incident on November 2nd when rainwater entered a building which created radioactive waste. There will be at least one permit non-compliance but until we have the formal investigation report, we cannot confirm the number or significance of non-compliances.

Other items of note

None

Actions and points of clarification from previous meetings

The independent witnessing of sampling of potentially contaminated rainwater took place in November. Unfortunately, a sample was not taken for independent analysis. This will be rescheduled in 2023.

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Nuclear Regulation Group (South)

Environment Agency

January 2023

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