

Devonport Local Liaison Committee Report

30 January 2024

July 2023 - January 2024

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, supported by Anastasia (Annie) Clark-Massey.

Richard and Annie are both members of the Environment Agency's Nuclear Regulation Group (NRG) South, which is based near Wallingford in Oxfordshire, although Richard is based in Exeter.

Contact Details

Richard Lee

Lead Nuclear Regulator

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Nuclear Regulator

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Attendance at site

We visit the site on a monthly basis but take part in some meetings remotely where this is more efficient. We did not carry out any inspections in this period. 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; these reports and our compliance assessments 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).

customer service line
03708 506 506

incident hotline
0800 80 70 60

floodline
03459 88 11 88

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 mentioned in our report for the September 2023 LLC that there was an incident at the DRDL site on 17 June 2023 in which two waste storage tanks overflowed. The liquid was contained within the bund that surrounds the tanks. Our assessment of the operator's investigation identified two non-compliances with the permit; we issued a RASCAR on 22 November 2023 which specified actions to be taken to prevent a recurrence of the event. We have provided a copy of this report to the LLC and a member of the public who had requested it at the September meeting.

Other items of note

We supported our DCIS Area colleagues by developing and issuing, in December, two Local Enforcement Positions. These enable abstraction, treatment, and disposal of groundwater during the construction of a subway services tunnel alongside 5 Basin. These are not related to radioactive substances and will be superseded in due course by an abstraction license and a permit.

Actions and points of clarification from previous meetings

The approval for HMNB allows discharge of potentially trace-contaminated rainwater to river. Two samples of such liquid, ready to discharge, was taken for analysis in April 2023: by DRDL on behalf of the Naval Base, and by our independent contractor (UKHSA). Concentrations of Cobalt-60 and tritium were below Minimum Detectable Amounts (MDA) for both. Concentrations of beta-emitting radionuclides were measured by UKHSA at a level below the operator's MDA. Although different techniques were used, the results are consistent and provide assurance about the measurements used to support such discharges.

Richard Lee

Lead Nuclear Regulator

Nuclear Regulation Group (South)

Environment Agency

January 2023