

Nuclear

The Babcock Nuclear Sector supports the Royal Navy to protect our shores and our overseas territories sustaining the entirety of the UK's submarine fleet and has proudly supported the Continuous at Sea Deterrent for more than 50 years.

Babcock Rosyth is home to one of the largest waterside manufacturing and repair facilities in the UK, which deal with the dismantling of decommissioned nuclear submarines and with nuclear waste / hazardous waste disposal.

Cavendish Nuclear, the civil nuclear arm of the Nuclear Sector, provides customers with a comprehensive range of critical nuclear solutions and services that support all aspects of the civil nuclear industry, from decommissioning nuclear facilities, through to supporting existing nuclear generation and facilities and new build.

Operating in Nuclear

Nuclear operations and management of nuclear materials is highly regulated by a comprehensive set of laws and stringent legislations. Activities are governed through a range of licences, permits and authorisations granted by regulatory authorities in the UK, including the Office for Nuclear Regulations (ONR), the Defence Nuclear Safety Regulator (DNSR) and the Environment Agency (EA) and the Scottish Environmental Protection Agency.

Safety and environmental protection remain the overriding priorities, and we must demonstrate to relevant regulatory authorities that we have adequate management arrangements to undertake nuclear operations safely and ensure that any risks are minimised.

We provide training and awareness to all personnel working on our sites to ensure that they understand how their activities can impact on Nuclear Safety and the controls that they must observe to protect the environment.

We ensure that employees are trained to a level appropriate to their role, from general environmental and climate change awareness, to spill management training, and specialist levels such as Radioactive Waste Advisors (RWA).

Certifications

- ISO 14001

Compliance as appropriate with:

- Waste (England and Wales) Regulations 2011
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Damage (Prevention and Remediation) (England) Regulations 2015
- Producer Responsibility Obligations (Packaging Waste) Regulations 2007
- Regulation (EC) No. 1005/2009 on Ozone Depleting Substances (ODS)
- Regulation (EU) No. 517/2014 on F-Gases
- WEEE Regulations 2013
- Energy Performance of Buildings (England and Wales) Regulations 2012
- Energy Savings Opportunity Scheme Regulations 2014
- Environmental Permitting (England and Wales) Regulations 2016
- Water Industry Act 1991

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Environmental Management

The Nuclear Sector covers Devonport RDL, Cavendish Nuclear and Rosyth RDL, all of which are Environmental Management Systems (EMS) certified to ISO 14001:2015. Part of the EMS requires that these sites identify and obtain the relevant environmental permits and licences required to operate from relevant regulators. These include but are not limited to: The Office for Nuclear Regulation (ONR), the Defence Nuclear Safety Regulator (DNSR), the Environment Agency and the Scottish Environmental Protection Agency.

Through the establishment of an EMS the plan, do, check, act cycle has been established. This in turn means the organisation identifies its compliance obligations, how to manage them, assures and then corrects any deviations from the expected outcome.

Within the EMS, policies have been established to drive compliance and ultimately environmental protection. The policies provide the commitment to high standards of environmental management and sets clear direction for the organisation to support all aspects of business performance as part of a demonstrable commitment to continuous improvement. These policies are fully aligned with the relevant Babcock International Group (BIG) policies:

- Group Sustainability Policy**
- BIG Energy Policy*
- BIG Health, Safety and Environment Policy*

Some of the Nuclear Sector sites sit directly on top of Marine ecosystems. It is therefore essential that these operations not only comply with legislation but drive continual improvement as to protect their surrounding environment. This requires consultation with relevant regulators, such as Natural England and the Marine Management Organisation, Scottish Environmental Protection Agency, Marine Scotland and the Maritime Coastguard Agency. It is key that these sites assist the regulator in improving water quality within these sensitive environments.

Compliance as appropriate with:

- Regulation (EC) No 1069/2009 on animal by-products
- Water framework Directive
- The Pollution Prevention and Control (Scotland) Regulation 2012
- The Nuclear Decommissioning and Waste Handling (Designated Technical Matters) Order 2010
- Nuclear Installations Act 1965
- Health and Safety and Nuclear (Fees) Regulation 2022
- The Ozone-Depleting Substances Regulations 2015
- The Water Environment (Controlled Activities) (Scotland) Regulations 2011
- Energy Performance of Buildings (Scotland) Amendment Regulations 2016
- Environmental Protection Act 1990
- Environmental Act 1995
- The Animal By-Products (Enforcement) (Scotland) Regulations 2013
- The Ground Water Directive (2006/118/EC)

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The EMS is built around the principles outlined in the BS EN ISO 14001:2015 Environmental Management System standard, which outline a framework to protect the environment and respond to changing environmental conditions in balance with socio-economic needs. It specifies requirements that enable an organisation to achieve the intended outcomes it sets for its EMS, which can provide top management with information to build success over the long term and create options for contributing to sustainable development.

The EMS at Rosyth is certified by DNV (Det Norske Veritas) to ISO14001 and is fully embedded within the Rosyth Royal Dockyard Integrated Business Management System (BMS). The BMS is held on an internal system (Babcock Connect) and is available to all employees.

The BMS at Rosyth holds all site processes dealing with waste management, conventional and radiological, including a suite of environmental aspects registers specific to all site projects.

Rosyth also has an appointed RWA who advises the board on all aspects of radiological waste be it solid, aqueous or gaseous. The site also carries out extensive surveys and sampling of the surrounding landscape and sea scape to provide regulators and the public that operations do not affect the environment in any way.

The Cavendish EMS is certified by DNV (Det Norske Veritas) to ISO14001 and is fully embedded within the Cavendish Nuclear Integrated Business Management System (BMS). The BMS is held on an internal system (Babcock Connect) and is available to all employees.

The Cavendish EMS contains thirteen procedures which control the environmental impacts of Cavendish Nuclear activities and ensure we meet the requirements of compliance obligations.

These are:

- 1) Waste Management – management of controlled waste including hazardous waste but excluding radioactive waste and liquid wastes

Sites regulated by the Office for Nuclear Regulation (ONR):

- Sellafield B14.1
- Devonport Royal Dockyard
- Rosyth Royal Dockyard

Sites regulated by the Environment Agency (EA):

- Berkeley Centre
- Greeson Court
- Sellafield B14.1
- Whetstone
- Devonport Royal Dockyard

Sites regulated by a Water Company:

- Greeson Court
- Whetstone
- Devonport Royal Dockyard

Sites regulated by a Local Authority

- Devonport Royal Dockyard

Sites regulated by the Marine Management Organisation (MMO)

- Devonport Royal Dockyard

Sites registered with the Animal & Plant Health Agency (APHA):

- Greeson Court
- Devonport Royal Dockyard
- Rosyth Royal Dockyard

Sites regulated by the Marine Scotland & Maritime Coastguard Agency

- Rosyth Royal Dockyard

Sites regulated by the Scottish Environment Protection Agency (SEPA):

- Rosyth Royal Dockyard

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- 2) Identification and Assessment of Environmental Aspects and Impacts – identification of all environmental aspects and how we control and mitigate their impacts and identify any associated risks and opportunities
- 3) Spill Management – management of spills of oils, chemicals, etc.
- 4) Packaging Compliance Scheme – compliance with the requirements of a Packaging Compliance Scheme
- 5) Projects – Environmental Requirements including the Environmental Support File – documentation of the environmental requirements of projects
- 6) Management of Equipment Containing F-Gas and ODS – completion of refrigerant inventories, F-Gas registers etc.
- 7) EEE and WEEE Producer Compliance Scheme – compliance with the requirements of a Producer Compliance Scheme
- 8) Environmental & Sustainability Key Performance Indicators (KPIs) – Identification, Monitoring, Measurement & Reporting – Cavendish Nuclear have identified a number of KPIs which are monitored and measured, and are reported internally and to Babcock Group
- 9) Radioactive Waste Adviser (RWA) – Identification, Appointment & Provision of Advice – RWA's are a requirement of Radioactive Substances Regulations (RSR) Environmental Permits
- 10) Air Conditioning (AC) Inspections – arrangement and completion of AC Inspections and the implementation of report recommendations
- 11) Energy Performance Certificates – obtaining Energy Performance Certificates (EPC) and the implementation of report recommendations
- 12) Energy Savings Opportunity Scheme (ESOS) and Energy Management – compliance with the ESOS Regulations and how energy use is minimised
- 13) Compliance with non-RSR Environmental Permits, Discharge Consents and Abstraction Licences – compliance with the requirements on non-RSR Environmental Permits and Discharge Consents for liquid wastes issued by the Environment Agency (EA) and water company respectively

The EMS interfaces with a number of other functions such as Engineering, Legal and Radiation Protection, as well as site-specific management systems to meet our environmental requirements. Examples of these are:

- Optimisation and Options Assessment Guidance – identification of Best Available Techniques (BAT) for the management of radioactive waste. This is referred to as Best Practice Means (BPM) at Rosyth
- HSSEQ, HR and Finance Compliance Obligations – identification and assessment of compliance obligations (statutory legislation, regulatory guidance, customer requirements etc.) and how it applies to Cavendish Nuclear and RRDL
- Radioactive Waste Arrangements – management of gaseous, liquid and solid radioactive waste

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- Compliance with Environmental Permitting Regulations - compliance with the requirements on RSR Environmental Permits issued by the EA and permits issued to Rosyth by SEPA
- Preparation and Dispensing of Fish, Shellfish and Seaweed Samples – preparation of animal by products for analysis and subsequent disposal.

* Available to employees through the Babcock intranet but not published externally

** Available on the Babcock website and available to employees through the Babcock intranet

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