Devonport Local Liaison Committee Report

10 July 2025

January 2025 - July 2025

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 Annastasia (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 works from our Exeter office.

Contact Details

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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 carried out two interventions in this period: in March we inspected HMNB's arrangements for managing radioactive waste arisings in 3 Basin and in June we inspected DRDL's Reactor Chemistry Laboratory.

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).

Improvement and Information Programmes

DRDL and HMNB notified us that they have completed the joint Waste Management Plan and Site Wide Environmental Safety case. This was a requirement of their permit and approval respectively. We will now review these and provide feedback at the first LLC meeting in 2026.

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

- The inspection of HMNB's 3 Basin identified good practice in the extensive preparation for the first transfer of large waste items from a Laid Up Submarine to DRDL's NEMSFAC building, ready for characterisation and subsequent disposal.
- The inspection of DRDL's Reactor Chemistry Laboratory did not identify any permit non-compliances but we made recommendations with the objective of reducing the risk of future non-compliances.
- DRDL have completed four out of the five actions raised in our environmental regulatory issue relating to uncontrolled water ingress into Radiologically Controlled Areas. We expect the fifth action, relating to asset management arrangements, will take some time to complete.

Other items of note

Pages 3-5 provide information on some aspects of the Environment Agency's wider role in nuclear regulation (see below).

Actions and points of clarification from previous meetings

None

Richard Lee

Lead Nuclear Regulator

Nuclear Regulation Group (South)

Environment Agency

July 2025

News Items for Stakeholder Liaison Meetings

1. Radioactivity in food and the environment report

Our annual report was published in November 2024 on GOV.UK

Radioactivity in food and the environment (RIFE) report - GOV.UK (www.gov.uk)

This report gives a detailed assessment of radioactivity in food and the environment and the public's exposure to radiation during a specific year. It shows that the public's exposure to permitted discharges and direct radiation near nuclear and non-nuclear sites is low and within dose limits.

The report brings together the nationwide monitoring programmes of the UK's food standard agencies and environment agencies. This monitoring is independent of, and is also used as a check on, the monitoring carried out by site operators.

This is now the second year we've published the whole report as a HTML document with associated ODS files. We no longer issue a PDF or print copy. Previous reports are on the National Archives website

Main messages

1. Overall, between 2022 and 2023 there were no significant changes to the radioactivity measured in food and the environment.
2. The dose received by the public near to nuclear licensed sites and industrial and landfill sites in the UK is low and again well within legal limits.
3. Food remains safe and the public's exposure to artificial radiation is within legal limits.
4. Radioactivity from natural background, rather than nuclear sites, continues to be the more significant source of exposure to communities in all areas of the UK.
5. Around 10,000 analyses and dose rate measurements were completed in 2023.
6. The data from our monitoring programme in this report demonstrates that radioactivity in food and the environment is safe.
7. 'Total dose' for the representative person at Devonport was less than 0.005mSv and unchanged in 2023.

2. Nuclear new build - early engagement guidance

We've published new guidance for developers and designers of new nuclear power stations who ask for a 'tier 3 preliminary design review (PDR). It complements guidance we published in March 2024 which sets out our early engagement process and how applicants can engage with regulators prior to entering generic design assessment or environmental permitting – or the ONR's site licensing process.

We'll provide technical advice and guidance on our expectations for new reactor designs, potential acceptability for deployment, and the routes to regulatory approval.

This joint guidance developed by the Environment Agency, ONR and NRW has been published on the joint GDA webpages on ONR's website.

3. Updated guidance: Monitoring the effects of permitted discharges from nuclear sites

We've published revised guidance on how to design and carry out an environmental radiological monitoring programme.

A radiological monitoring programme is a requirement of a radioactive substances activity permit which is held by operators of nuclear sites in England and Wales.

The guidance will also be used by the Environment Agency and other regulators and organisations who have or participate in independent environmental radiological monitoring programmes.

An operator's monitoring programme includes what they'll monitor, where and how often and the monitoring and sampling techniques.

What's new

No longer has separate objectives for operators and regulators in relation to understanding doses to people and wildlife

One of the criteria for defining a site's impact is the level of dose to the representative person. The change to the threshold of optimisation (Managing Radioactive Substances and Nuclear Decommissioning: UK policy framework) from 0.02 mSv/y to 0.01 mSv/y has been adopted in the guidance when it comes to defining a site's impact and for including the need to "assess total representative person dose" as an objective.

Recognition of innovation and new techniques – we're happy to consider proposals from operators

Inclusion of programmes for sites with a potential for variable impact (such as decommissioning sites)

Example programmes as guidance to what an appropriate programme could comprise for different impact sites for those designing programmes

How to consider sustainability such as minimising the sampling of living wildlife and habitats

Accessible format on GOV.UK

Read the guidance Environmental radiological monitoring: planning and implementing your programme - Guidance - GOV.UK

Read about our monitoring programmes Monitoring radioactivity - GOV.UK

Read the annual Radioactivity in Food and the Environment (RIFE) report. Radioactivity in food and the environment (RIFE) report - GOV.UK RIFE provides a detailed assessment of radioactivity in food and the environment and the public's exposure to radiation during a specific year. It brings together the nationwide monitoring programmes of the UK's environment and food standard agencies.

4. Public consultation: Application for the on-site disposal of solid radioactive waste at the Winfrith Nuclear Research site in Dorset

Nuclear Restoration Services Ltd (NRS) has applied to vary (change) its Radioactive Substances environmental permit at the Winfrith Nuclear Research site in Dorset.

The Winfrith site is in the final stages of decommissioning; all the buildings will be knocked down and the site will be returned to heathland with public access. NRS is proposing to bury some of the demolition waste on site and some of this waste is radioactive. NRS has applied to vary its Radioactive Substances

environmental permit to allow this to be done and has also applied for a new Deposit for Recovery environmental permit to allow it to bury non-radioactive demolition waste.

Most of the waste is low or very low-level radioactive waste. No higher activity waste will be left on site, that's being transferred off-site and kept securely for final disposal in a Geological Disposal Facility. Our 2018 guidance document: "Management of radioactive waste from decommissioning of nuclear sites: Guidance on Requirements for Release from Radioactive Substances Regulation," which we call GRR, gives site operators the option to leave radioactive and non-radioactive waste on site if it represents the best option after balancing social, economic and environmental factors. Winfrith is the first site in England to make permit applications using the GRR guidance.

We are holding an initial online consultation from Tuesday 3 June to Friday 5 September. You can read the application documents and have your say through our consultation website: Radioactive Substances Regulation variation, and Deposit for Recovery permit application

We will address all the comments that we receive during our technical assessment of the applications. After this assessment is complete, we will set out our proposed decisions to issue or reject the permit applications. We will run a second public consultation and carefully consider the responses before we make our final decisions. We hope the consultation on our proposed decisions will take place in early 2026.

5. LinkedIn

Follow our Environment Agency Linked in page for news and information about regulating radioactive substances

https://www.linkedin.com/showcase/regulating-radioactive-substances

6. Consultations

All our open consultations will appear on this webpage Nuclear consultations - Environment Agency - Citizen Space (environment-agency.gov.uk)

These include consultations relating to a variation of the radioactive substances permit for Hinkley Point B and a consultation about a revised Environmental Safety Case for the Port Clarence landfill sites in Teesside for low level radioactive waste.