

Office for Nuclear Regulation (ONR)
Site Report for
BAE Systems Marine Limited (BAESML)
Devonshire Dock Complex
Report for period 1 January – 30 June 2022

Foreword

This report is issued as part of ONR's commitment to make information about inspection and regulatory activities relating to the above site available to the public. Reports are distributed to members for the BAESML Local Liaison Committee (LLC) and are also available on the ONR website (<http://www.onr.org.uk/lc/>).

Site inspectors from ONR usually attend BAESML LLC meetings where these reports are presented and will respond to any questions raised there. Any person wishing to inquire about matters covered by this report should contact ONR.

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1. Inspections

1.1. Dates of Inspection

The ONR site inspector made inspections on the following dates during the report period:

- 25 January
- 1 & 2 March
- 26 April
- 10 & 11 May
- 26 May

2. Routine Matters

2.1. Inspections

Inspections are undertaken as part of the process for monitoring compliance with:

- the conditions attached by ONR to the nuclear site licence granted under the Nuclear Installations Act 1965 (NIA65) (as amended);
- the Energy Act 2013
- the Health and Safety at Work etc Act 1974 (HSWA74); and
- regulations made under HSWA74, for example the Ionising Radiations Regulations 2017 (IRR17) and the Management of Health and Safety at Work Regulations 1999 (MHSWR99).

The inspections entail monitoring the licensee's actions on the site in relation to incidents, operations, maintenance, projects, modifications, safety case changes and any other matters that may affect safety. The licensee is required to make and implement adequate arrangements under the conditions attached to the licence in order to ensure legal compliance. Inspections seek to judge both the adequacy of these arrangements and their implementation.

In this period, routine inspections of the Devonshire Dock Complex licensed site covered the following:

- management of operations including control and supervision;
- staff training, qualifications and experience;
- plant construction and/or commissioning;
- radiological protection;
- organisational changes;
- quality assurance and records

Members of the public, who would like further information on ONR's inspection activities during the reporting period, can view site Intervention Reports at www.onr.org.uk/intervention-records on our website www.onr.org.uk. Should you have any queries regarding our inspection activities, please email contact@onr.gov.uk.

2.2. Boat 5 (Anson) Hold Point 7 Release

In June 2022, ONR agreed to the release of a regulatory hold point on the initial criticality, physics tests and power range testing and fast cruise for boat 5 ("Anson"). As per the approved permissioning strategy, this holdpoint was controlled through 'Enhanced Implementation Monitoring & Control'.

Whilst this phase of the activity represents an increased risk (due to the operation of the reactor for the first time), ONR considered it a proportionate means of regulatory control, alongside other regulatory activities, including ONR-led focused compliance inspections and ONR's participation in the Defence Nuclear Safety Regulator (DNSR)-

led operational readiness inspection. ONR has also assessed previous versions of the safety case for this activity for boats 1-3, with a similar approach for boat 4.

From the targeting of our planned compliance inspections, we were able to engage and sample areas which were important to readiness for the hold point. These included the organisational capability, arrangements, and structure, which during this period is complex due to multiple stakeholders with specific decision making or control and supervision of activities.

Although for some inspections we identified some shortfalls in the arrangements and/or the implementation, these did not adversely impact our judgement on the release of the hold point and we are content that we have adequate regulatory routes in place to address these as part of routine regulation. All inspections provided regulatory evidence and assurance to the sites' readiness to undertake the activity.

From our participation in the Operational Readiness Inspection, we reviewed the site's internal process for determining 'if it is safe and wise to proceed', which included evidence reviews from key roles and concurrence by the BAESML Independent Nuclear Assurance team. We found that to be a robust process.

2.3. Other Work

The site inspector held a periodic meeting with safety representatives, to support their function of representing employees and receiving information on matters affecting their health, safety and welfare at work.

BAESML schedules regular regulatory interface meetings (RIF) covering overview of the build programmes, improvements to the site safety cases and their implementation. The RIFs also cover regulatory issues progress and oversight of the site redevelopment project (SRP) work. This included regulatory oversight of the construction of the new facilities on the licensed site. The ONR Site and Project Inspectors attended these meeting (usually virtually) during the period.

At the quarterly regulatory interface meetings (known as the 'Level 3 RIF') ONR were, along with DNSR, the Environment Agency and BAESML, able to agree the Submarine Nuclear Safety Hold Point Control Plan and SRP Overarching Strategy & Regulatory Hold Point Control documents. These documents set out an agreed position between regulators and the dutyholder as to when ONR will engage with projects, where BAESML will seek specific permissions to proceed and what engagement will take place to support these permissions.

3. Non-Routine Matters

Licensees are required to have arrangements to respond to non-routine matters and events. ONR inspectors judge the adequacy of the licensee's response, including actions taken to implement any necessary improvements.

There were no such matters or events of nuclear safety significance during the period.

4. Regulatory Activity

ONR may issue formal documents to ensure compliance with regulatory requirements. Under nuclear site licence conditions, ONR issues regulatory documents, which either permit an activity or require some form of action to be taken; these are usually collectively termed 'Licence Instruments' (LIs) but can take other forms. In addition, inspectors may take a range of enforcement actions, to include issuing an Enforcement Notice.

- No LIs, Enforcement Notices or Enforcement letters were issued during this period.

ONR did however release a hold point for the release of the hold point for initial criticality, physics tests and power range testing and fast cruise, via 'Enhanced Implementation, Monitoring & Control'. Further detail is provided in section 2.2.

Reports detailing the above regulatory decisions can be found on the ONR website at <http://www.onr.org.uk/pars/>.

5. News from ONR

For the latest news and information from the Office for Nuclear Regulation, please read and subscribe to our regular email newsletter 'ONR News' at

www.onr.org.uk/onrnews

6. Contacts

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