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20 May 08

NPW OPERATIONAL BERTHS AT LOCH EWE AND BROADFORD BAY – SUSPENSION OF DNSR CONSENT FOR USE

References:

- A. Radiation (Emergency Preparedness and Public Information) Regulations 2001 (REPPIR).
- B. JSP 518 – Regulation of the Naval Nuclear Propulsion Plant.
- C. NNRP/11/14 dated 20 May 05 – Highport 2005 – NNRP Assessment.
- D. 2007 DIN6 122.

1. The triennial test of the Operator's and Off-Site Emergency Plans for the Nuclear Powered Warship Operational Berths at Loch Ewe and Broadford Bay under REPPIR (Reference A) was conducted between 13 and 15 May 2008 as Exercise Highport 08. As a result of this test, DNSR and HSE has concluded that the Operator's Emergency Plan for these berths does not constitute adequate arrangements for the protection of the workforce and public as required by References A and B in spite of the enthusiastic participation of those who took part. Consequently DNSR's consent to the use of these NPW Operational Berths is now suspended and these berths should not be used by Nuclear Powered Warships.

2. A full report on the exercise and review of the Operator's Plans will be forwarded in due course but key to DNSR's considerations was the limited demonstrable response to the findings raised in the previous exercise report at Reference C. The key issues include but are not limited to:

- a. The Operator's plans do not support the off-site plans; indeed they are contradictory at times.
- b. There are discrepancies and contradictions in the locations and responsibilities of key individuals.
- c. The arrangements for communication and cooperation with civil authorities are unclear and the necessarily dispersed response locations demand clarity in the decision making processes.
- d. The arrangements for the management of interventions, especially involving non-MOD and contractor personnel are unclear.

3. In order to reinstate consent to use the NPW Operational Berths at Loch Ewe and Broadford Bay, DNSR requires the following activities to be completed and formally reported to DNSR (noting that a full re-demonstration exercise is not required):
 - a. A thorough review of the Operator's Emergency Plans taking into account the issues raised at Para 2 above, Reference C and the detailed report on Ex Highport 08 which will be issued in due course.
 - b. Confirmation that the Operator's and Off-Site plans are compatible.
 - c. Formal approval of the Operator's Emergency Plans through the appropriate due process, including the necessary statutory consultation.
4. The shortfalls in the arrangements are specific to the Operator's Emergency Plan. The remaining arrangements required by Reference D in support of the berths at Loch Ewe and Broadford Bay remain acceptable to DNSR.
5. Should an urgent operational or safety need arise to use these Operational Berths, DNSR will consider each case on its merits.
6. The contents of this letter have been agreed with HSE-NII

Signed on Original

Information:

NRPA (for SD and BAM-N1)

CSSE (for DCSSE, OPS and OPS3)

NBC(C) (for DSA, HSA, COB and NEPO)

DSC (for AD NAR)

SONART

HSE-NII (for [REDACTED] [REDACTED] [REDACTED] and [REDACTED])

DNSR-D

NPR

NWR

ICF

INB