

Devonport Local Liaison Committee Report

27 January 2025

July 2024 - January 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 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

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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 carried out four interventions in this period: in August we reviewed progress on the joint DRDL/HMNB Waste Management Plan and Site Wide Environmental Safety Case (due June 2025); we inspected DRDL's Effluent Receipt Area in August after rainwater entry; we inspected DRDL's arrangements for managing and disposing of Very Low Level Waste in November; and we inspected the newly-restored disposal route for boronated aqueous waste in December.

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.

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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).

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 WMP/SWESC review identified good progress; we recommended that the links between our guidance and the joint operators' reports should be clearer.
- Our inspections and evidence review (following the uncontrolled entry of rainwater into DRDL's Effluent Receipt Area) identified a number of non-compliances with potential for adverse impact on the environment. We raised an Environmental Regulatory Issue, with the first actions due on 31 January 2025.
- The Very Low Level Waste inspection in November identified two minor non-compliance with no adverse impact on the environment. We also made recommendations and observations. DRDL will make changes to their written arrangements to restore compliance.
- The December inspection reviewed the disposal route for legacy boronated aqueous waste. We did not identify any non-compliances but will make recommendations.

Other items of note

From this report onwards we will include items about the Environment Agency's wider role in nuclear regulation (see below). These will be included in our reports to all equivalent meetings.

Actions and points of clarification from previous meetings

None

Richard Lee

Lead Nuclear Regulator

Nuclear Regulation Group (South)

Environment Agency

January 2025

News Items for Liaison Committee Meetings

1. Public consultation: Regulation of solid radioactive waste disposal facilities - proposed guidance

The Environment Agency, NRW and NIEA are consulting on proposals to update the guidance on how we regulate near surface and geological disposal facilities. The draft guidance documents explain what an operator must show us to obtain an environmental permit or permits for such a radioactive waste disposal facility. The draft guidance we are consulting on consists of:

- Disposal facilities for solid radioactive waste: guidance on the requirements for authorisation (GRA)
- Guidance on staged regulation

The consultation on the draft GRA applies to England, Wales, and Northern Ireland. There will be a separate consultation on a version of the GRA for Scotland.

The consultation on our staged regulation guidance is for England only.

We held an online consultation event for anyone with an interest or question about the documents in January.

There's a public summary available on both links below (HTML on gov and ODT on Cit space).

The consultation closes on 28 February 2025.

GOV.UK [Regulation of solid radioactive waste disposal facilities: proposed guidance - GOV.UK](#)

Consultation response page [Guidance on the requirements for authorisation and staged regulation for the disposal of solid radioactive waste - Environment Agency - Citizen Space](#)

2. 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.

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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

3. Geological disposal: scrutiny of Nuclear Waste Services' work - annual reports

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

[Geological disposal: scrutiny of Nuclear Waste Services' work - annual reports - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

Through our joint scrutiny work, the Environment Agency and the Office for Nuclear Regulation (ONR) provide regulatory advice to Nuclear Waste Services about implementing geological disposal.

These annual reports explain what we examined through our scrutiny work and the main comments provided to Nuclear Waste Services. They also highlight areas where Nuclear Waste Services needs to improve.

The Environment Agency and ONR will make sure that any future geological disposal facility meets our high standards for environmental protection, safety, security, radioactive waste transportation and safeguards.

4. Assessing new nuclear power station designs – Have your say

Generic Design Assessment (GDA) is an open and transparent process. A nuclear power station design company going through GDA must set up a website to:

- publish information about the design
- invite the public to ask questions and make comments

The design company must respond to any comments or questions they receive. The regulators will see the comments and questions and the responses provided. We can also use this information to help inform our assessment work.

The Environment Agency has:

- completed step 2 and started step 3 of the [Generic Design Assessment](#) on Rolls-Royce SMR Limited's 470MWe small modular reactor on 30 July 2024. The [public comments process](#) for this GDA opened at the start of Step 2 and you can make a comment through the company website.
- completed step 1 and started step 2 of the [Generic Design Assessment](#) on Holtec International's small modular reactor SMR-300 on 1 August 2024. The [public comments process](#) for this GDA opened at the start of Step 2 and you can make a comment through the company website.
- completed step 1 and started step 2 of the [Generic Design Assessment](#) on GE-Hitachi Nuclear Energy's BWRX-300 small modular reactor on 12 December 2024. GDA Step 1 of the GE-Hitachi SMR: statement of findings - GOV.UK The [public comments process](#) for this GDA opened at the start of Step 2 and you can make a comment through the company website.

Learn more about assessing new reactor designs [New nuclear power stations: assessing reactor designs - GOV.UK \(www.gov.uk\)](#)

Read our blog [Ensuring nuclear reactor designs meet high standards of environmental protection – Creating a better place \(blog.gov.uk\)](#)

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5. Updated guidance: Regulatory expectations for successful land quality management at nuclear licensed sites

The environment agencies and the Office for Nuclear Regulation (ONR) have [published updated guidance](#) that sets out our high-level regulatory expectations for the prevention and management of radioactive and non-radioactive contamination of the ground and water on nuclear licensed sites.

It updates joint guidance issued in 2014, reflecting how some land quality issues can also now be covered through the Site Wide Environmental Safety Cases and Waste Management Plans created under our guidance on “Management of radioactive waste from decommissioning of nuclear sites: Guidance on Requirements for Release from Radioactive Substances Regulation” (the GRR).

The guidance highlights the five key principles that we expect operators / licensees to consider when preventing and managing land and water contamination, namely:

- establish strategies and plans for land quality management
- prevent new contamination of land or the water environment
- understand the land quality and contamination characteristics of the site
- manage land quality to mitigate safety and environmental risks
- work with stakeholders and other interested parties

The guidance describes our shared and complementary interests in land quality matters, explains how we expect climate change and sustainability to be taken into account and provides a reference list of further reading.

[Land quality management | Office for Nuclear Regulation](#)

6. Chief Regulator's Report

We've published the first Chief Regulator's report. It summarises the performance of the businesses and activities regulated by the Environment Agency in England in 2023-24. It outlines key outcomes of our regulation, providing assurance and transparency across our wide regulatory remit, and it sets out the aims and ambitions of our Chief Regulator, Dr Jo Nettleton.

The report covers our work regulating the nuclear industry and radioactive substances during 2023-24.

[Environment Agency Chief Regulator's report 2023-24 - GOV.UK](#)

7. LinkedIn

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

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

8. Consultations

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