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For the attention of [REDACTED] – Strategic Operations & Engineering Manager
RNAD Coulport

ONR RESPONSE to SWS OPTIONS INSPECTION

Dear Sir

Following the joint inspection of RNAD Coulport's arrangements for post vesting I am writing to confirm that ONR are of the opinion that MoD are in sufficient control of operations to allow the authorisation regime to continue for the present.

As part of the inspection ONR assessed the arrangements for MoD control against those specified in the AC36 submission and against ONR expectations. The specific areas that ONR considered key in coming to this conclusion are included, for information, in an annexe to this letter.

ONR's assessment is based on the arrangements described during the inspection, and these will be re-inspected post vesting, to ensure they are operating in a manner that ensures that MoD remain in control. This will be part of a joint inspection with DNSR and will take place approximately six months after vesting.

ONR have stated previously (ref: CNB 70116N) that the level of MoD control is considered the minimum to allow MoD to demonstrate control and then only when considered within the wider construct of HMNB Clyde. ONR will continue to monitor any changes to organisation at HMNB Clyde and RNAD Coulport to ensure that the cumulative impact does not erode MoD's overall control.

The contents of this letter have been discussed and agreed with DNSR.

Yours faithfully

[Redacted]

HM Inspector - Nuclear Safety

Cc: [Redacted] ONR
[Redacted] DNSR

[Redacted]

ANNEX A

The following is the list of factors that ONR considered in determining that MoD retains sufficient control at RNAD Coulport to allow the Authorisation regime to continue.

There are appropriate and sufficient MoD Suitably Qualified and Experienced People, albeit a minimum, post vesting to demonstrate that MoD is in control of nuclear operations at RNAD Coulport, when considered within the wider HMNB Clyde construct. In the absence of MoD SQEP, nuclear operations will not commence and MoD retain control of this decision.

Supporting information:

- MoD posts identified in the AC36 submission have been filled
- Surveillance Officer posts, with responsibility for observing nuclear operations are SQEPed against their role requirements.
- Operations with the potential to impact on nuclear safety are witnessed by MoD Surveillance Officers, who have the authority to stop operations if safety is at risk of being compromised.
- The operations to be carried out on the day are agreed at the Daily Brief Meeting, which will be chaired by MoD. It was stated by MoD Coulport that this includes a check on adequacy of resources, although this was not inspected by ONR.

Both MoD and the Alliance will be following the proven procedures in place across HMNB Clyde.

Supporting information:

- Key safety committees that approve changes that may impact on safety continue to be chaired by MoD. This means that MoD has control over changes to documentation, appointments, the organisation and modifications which may impact on nuclear safety.
- MoD Assurance group continues to carry out audits of compliance and effectiveness of MoD and contractors on the site.
- The processes being followed are the same as those used on the wider Clyde site. For example appointment of DAPs process, maintenance schedule change process,

During active operations and normal working hours a MoD Incident Commander (IC) will be resident. At other times the MoD IC will be available within an appropriate time.

Supporting information:

- The only time when a MoD Incident Commander may not be present is during silent hours, when the base is in a 'non-active' state. During this period the RDOIC will take the initial response against defined procedures. The MoD Incident Commander will be contactable if a non-standard response is

required and will be within 1 hour travel distance of the base. The RDOIC is not necessarily a MoD employee, but will be appointed by MoD.

Appropriate measures are being pursued to ensure that adequate succession planning and long term sustainability is in place.

Supporting information:

- The Clyde Development Panel has been set up to ensure that MoD have sufficient SQEP resource for the future.
- The contract allows for secondment between MoD and contractors to ensure MoD staff can gain the necessary experience to take on key roles at Coulport in the future.

It should be noted that changes that impact on the arrangements quoted above, would not necessarily mean that the authorisation regime could not continue, nor does it mean that changes which do not affect the above would not impact on MoD control. The factors outlined above are those that ONR have considered as part of the inspection and judged to be important at this time in demonstrating that MoD remain in control post vesting.