

Environment, Safety, and Health

Annual Review of Safety 2014

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Draft A1	10 Oct 14	First Draft for comment
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	EDMS3/8023FA43
	Issue 1
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ATTENDANCE

Name	Organisation	Remarks
Mr Rob Fletcher	AWE,	
•	Acting Managing Director	
	AWE,	Chairperson
	Head of ES&H	·
For AWE		
	Head of Internal Regulation	
	Head of Nuclear Safety	
	Programme Assurance	
	Head of Fissile Materials	
	Technology Centre	
	ESH Service Lead (Science	For
	& Systems Engineering)	Head of Technology Centre -
		Hydrodynamics
	Principal Facility Manager	For
	(Explosives)	Head of Explosives
	, ,	Technology Centre
	Site Manager	
	Head of Assembly and	
	Disassembly Technology	
	Centre	
	Projects Assurance Manager	
	Projects Quality Assurance	
	& Control	
	Projects Assurance Manager	
	Senior Supply Chain	
	Manager	
	Head of Management	
	Systems	
For Regulatory Comm	nunity	
	ONR Regulator	
	HSE (HID) Regulator	
	Environment Agency	
	Regulator	

OVERVIEW

This document provides an overview of AWE's Annual Review of Safety for 2013 / 2014.

The Annual Review of Safety broadly followed the process laid out within CQM300 – Management Review, and considered;

- The continuing suitability and effectiveness of the Company Safety, Health, and Environmental Systems in satisfying legislative / contractual or other requirements
- Business and regulatory risk

Performance against Key Performance Indicators data is included along with analysis against the Corporate Scorecard supplied by the KPI owner and an overview of operational areas aligned to the RIM structure.

*The data presented in this report is extracted from a number of Company systems including DataStream, Oracle Business Intelligence, and FOR@ction.

INTRODUCTION

This meeting was the AWE Annual Review of Safety presentation to the regulatory community.

The meeting notes comprise the following elements:

- A copy of all slides presented at the review
- Amplification of key points which were raised during the review as appropriate.

Rob Fletcher, Acting Managing Director, provided an introduction to the session, invited attendees to introduce themselves and gave an assurance moment.

Rob went on to introduce the general format of the presentations which would give an overview of performance, key regrets, learning and the forward focus. Key points discussed included:

- Significant collaborative working has occurred to deliver additional controls at AWE(B)
- Changes in approach to ensure programmes are achievable and outputs are of suitable quality.
- It was recognised however that there are a number of opportunities to learn and improve. Examples include;
 - LI511
 - Quality of Staged Safety Reports
 - A number of events, including;
 - Fire Detection & Alarm Systems

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- o SCBP event
- o Tritium discharge
- Gaps within our environmental baseline
- Warning letters and enforcement action

He highlighted that AWE is going through a period of change and we need to ensure the focus on safe secure and clean operations is maintained.

on behalf of the Regulatory community thanked AWE for the success of the previous years Annual Review of Safety and the open and honest language that was used. He requested that in future the Annual Safety Data be issued further in advance of the formal meeting and, where possible, of a lower classification to allow time to review and digest the information.

ESH PERFORMANCE

provided an overview of ESH performance, introducing the revised dashboard approach to the performance segment.

Key points included;

- Process Safety performance has continued to show improvement, and revised KPI incorporate a stronger set of Leading measures whilst maintaining effective Lagging measurement to drive further improvement.
- A continued reduction in OSHA TRIR, achieving AWEs lowest ever OSHA TRIR rate during the period.

The regulatory community felt it was good to see progress on PRS strategy, however there was a wish to see more dates associated with this program

Regulatory community asked how many of the themes identified through last years Annual Review of Safety could be considered closed out. Identified activity against all of the themes, a number of which can now be considered as fully addressed, however some will remain as ongoing activities for the foreseeable future.

Within the overview of ESH performance a number of improvement programmes were highlighted and discussed, including supply chain. provided an overview of Current activities underway to ensure a consistent and graded approach to Quality through the supply chain.

INTERNAL REGULATION

gave an overview of the Internal Regulation view of performance based on Internal Regulation activities throughout the past period.

This identified that it had been a changeable year and had therefore proved challenging to undertake what would be considered a 'normal' review.

The key points made during this segment were;

- was a major challenge and drove AWE to work in a significantly differently way.
- With respect to Regulatory Interface, it was identified that some improvements have been made to the RIM process and NEESP.

- Internal regulation inspections are becoming consistently more forward looking and system based, looking for the line of site through from the safety case and associated barriers to the job being undertaken on the shop floor.
- Deep dive reviews are being more frequently used and have proven an efficient way of revealing issues quickly.
- There is a need to move to a more strategic approach and consequently pre-empt issues rather than the current tendencies, where crisis management, albeit a strength, is the normal way of working.

In summing up, overall performance was generally considered to be improving and culture was clearly moving in the right direction. It was recognised and highlighted to the regulatory community that AWE was entering into a

The regulatory community suggested having a busy year would not be a good excuse for not consistently achieving Right First Time safety submissions. There was discussion as to whether the current good culture would remain as AWE transitioned though this busy period.

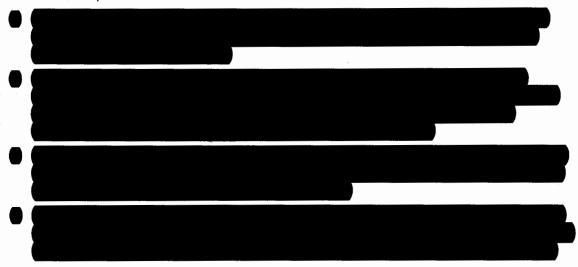
It was however recognised unanimously that there was a balance to be found between driving for delivery versus allowing sufficient time to do things right. While there is a need for deadlines, these need to be achievable.

REGULATORS VIEW

An overview was sought from the regulatory community on AWE performance.

This identified:

- Good Industrial safety performance
- It was considered good to see the level of self-reflection
- HID saw AWE in a very positive light
- ONR may have different view that AWE on improvements claimed since last AROS
- There are some good examples given on performance and performance has generally been considered adequate, but equally there are still considered to be some issues;



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 DNSR agreed with the comments previously made and indicated that performance was going the right way.



In summing up ONR identified that last year both AWE (A) and AWE (B) were classified as Category 2 sites. Now AWE (B) has been reduced to Category 3, however AWE (A) remains at category 2.

CORPORATE RIM

provided an overview of activities and performance from the corporate RIM viewpoint.

The regulatory community considered some of the key items were somewhat slow to progress. However, in the case of the state of the transfer of the key items were somewhat slow to progress. However, in the case of the transfer of the key items were somewhat slow to progress. However, in the case of the key items were somewhat slow to progress. However, in the case of the key items were somewhat slow to progress. However, in the case of the key items were somewhat slow to progress. However, in the case of the key items were somewhat slow to progress. However, in the case of the key items were somewhat slow to progress. However, in the case of the key items were somewhat slow to progress. However, in the case of the key items were somewhat slow to progress. However, in the case of the key items were somewhat slow to progress. However, in the case of the key items were somewhat slow to progress. However, in the case of the key items were somewhat slow to progress. However, in the case of the key items were somewhat slow to progress were slow to progress. However, in the case of the key items were somewhat slow to progress. However, in the case of the key items were somewhat slow to progress were slow to progress were

FISSILE MATERIALS

gave an overview of Fissile Operations.

The success of the Phoebe project was recognised and ONR were interested in feedback in support of a review of the effectiveness of the initial enforcement notice to identify if the action taken was correct or whether a different approach have been utilised.

The regulatory community were also pleased to hear about the work on improved supervision and had an interest in how AWE measures the effectiveness of the Senior Manager Walk-troughs' that are routinely being undertaken.

BURGHFIELD LICENCED SITE

gave an overview of the Burghfield Licensed site.

As a relative newcomer to AWE, identified that he had been impressed with the culture and behaviours observed.

Issue

ISSUE I
SCIENCE
on behalf of gave and overview of Science area.
ONR questioned the timescales for second and on transport arrangements.
The topic of delays to delivery of safety cases prompted a response that the regulatory community would be more challenging in relation to the PCSR.
PROJECTS
gave an overview of Major Projects area, along with a presentation by on Supply Chain Management with the Major Projects area.
The regulatory community reinforced the need for improved early engagement with stakeholders, including the EA.
The quality of safety submissions were agreed as key.
There was a need identified for confidence that the proposed programmes and quality of submissions became more predictable. Additionally it was discussed that AWE would benefit from more mature designs of PP&E before construction. Deep dives into specific projects aimed at assessing whether programmes are achievable, along with the new, programme led, AWE structure should support improvements going forward.
SITE
gave an overview of the Site area.
ONR were interested in how AWE plan to manage High Activity Waste going forward.
Under the revised organisational structure Site will become a significantly larger organisation. There was constructive discussion as to how AWE maintains focus in this area.
ENVIRONMENT
went on to provide an overview of Environment. EA identified that there is a need to ensure early engagement with key stakeholders where some permit issues may require addressing.
EXPLOSIVES
on behalf of gave an overview of the Explosives area
It was identified that the Explosives level three RIM that has been established has been well received and has supported better drawing together of Explosives related issues.
HID felt that AWE had underplayed the amount of work completed related to the The only disappointments were related to the local area staff, who appear to be

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loosing some enthusiasm due to the amount of time the facility had been off-line, as well as some decisions of surface finishes within the facility.

There was a constructive discussion related to how AWE and the regulatory community could optimise processes to accommodate non-nuclear projects and facilities that are located on the nuclear licensed sites.

as this required engineering substantiation that would ordinarily not be required for this type of facility.

Licensing timescales where also discussed at length, in that licensing of the building appears to have been significantly delayed due to events outside of AWE. There was broad agreement that, under the new organisation of ONR, this situation needs to be further understood and rectified.

WASH-UP, KEY POINTS & OBSERVATIONS

The following points were made;

- It was recognised that there are many long lived corporate issues but the regulatory community is seeing some progress in moving these forward.
- There is a notable change in focus from personal to process safety.
- The progress made with the RIM structure and operation received positive feedback.
- Delays and predictability of submissions has been an ongoing issue related to projects and PRS. Ongoing and early engagement with regulatory community is key to ensuring these are progressed.
- A number of projects and production demands are running concurrently. Focus needs to be maintained within this environment.
- Greater clarity on focus areas and priorities.
- Some great work has been done through the challenge will be keeping the momentum and sharing the learning.

REGULATORY NUCLEAR INTERFACE PROTOCOL FEEDBACK

The RNIP feedback was completed for:

Areas of good practice:

- Regulatory engagement
- To time
- Minimum surprises
- Openness
- Self-critical

Areas for improvement:

- Timeliness of delivery of the data pack to regulatory community
- Security classification of data pack

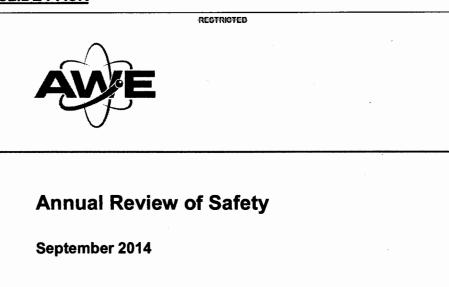
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- Timescales covered
- Presence of directors

ACTIONS

Action	Owner	Due Date
1 LC Compliance Matrix; Compare AWE		
vs Regulatory view		

ANNEX A: SLIDE PACK



RESTRICTED

RESTRICTED Agenda Company Performance 09:00 Welcome and Today's Key Messages Rob Fletcher 09:10 Assurance Moment 09:20 ESH Performance 09:50 Internal Regulation 10:20 Regulators View Regulators 10:45 Coffee Break Operational Performance 11:00 Corporate 11:20 Fissile Materials 11:40 Burghfield LS 12:00 Science 12:20 Projects Lunch 14:00 Site 14:20 Environment 14:40 Explosives 15:00 Questions / Feedback / Work going forward 15:30 Meeting Close -RESTRICTED



Introduction and Overview

Purpose:

 Senior Management shall review the organizations management systems for maintaining safe, secure and clean operations to ensure its continuing suitability, adequacy and effectiveness.

Today's Key Messages:

- Continued efforts to achieve world class safety performance
 - . TRIR & Process themed events
 - Right First Time submissions
 - · Effective arrangements consistently deployed
- Change
- Approach to Management Review (AROS)

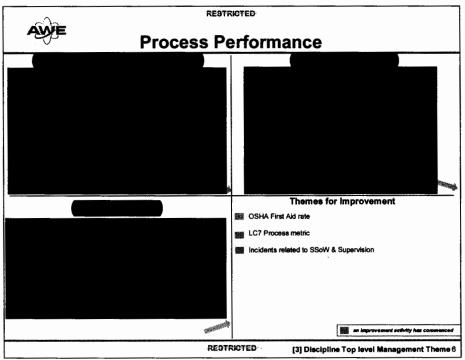
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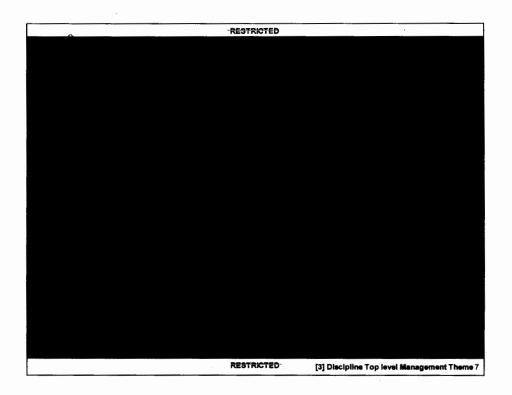
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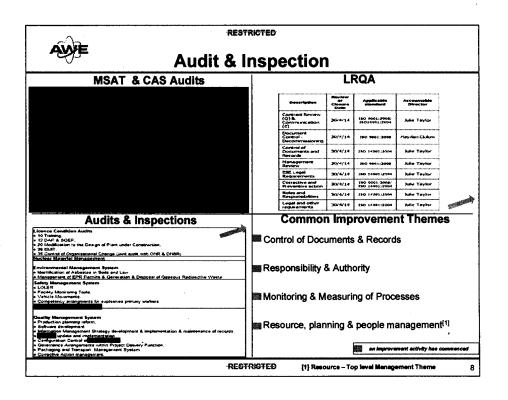
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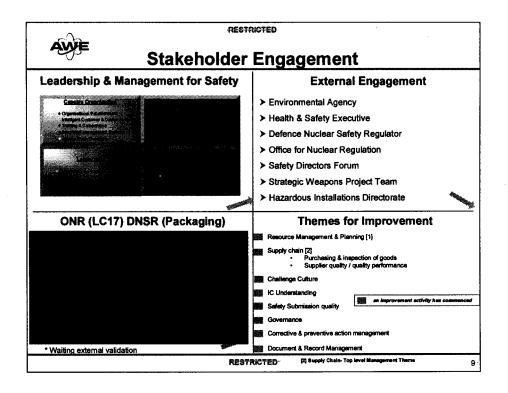
ESH Performance

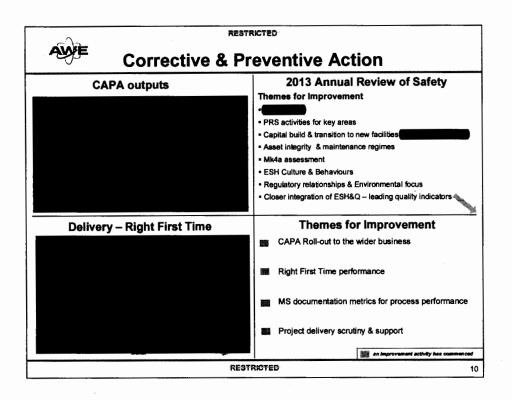
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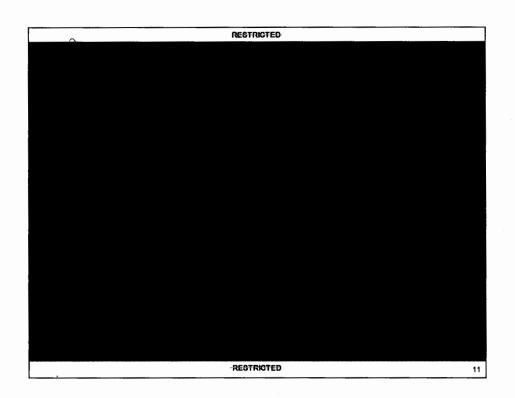


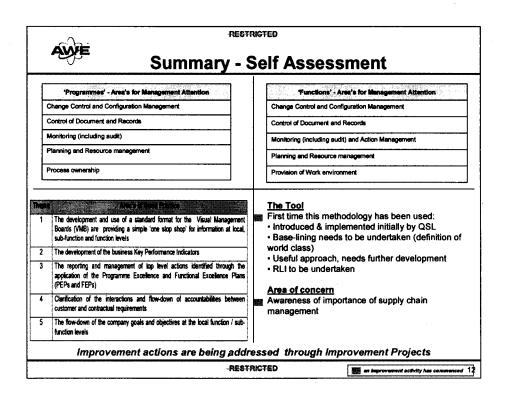


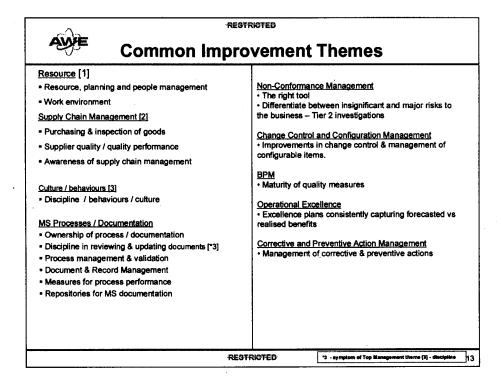


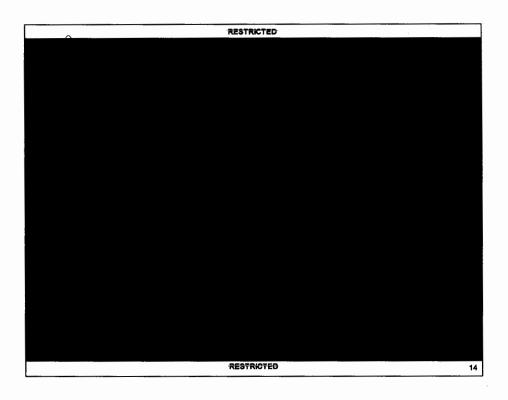


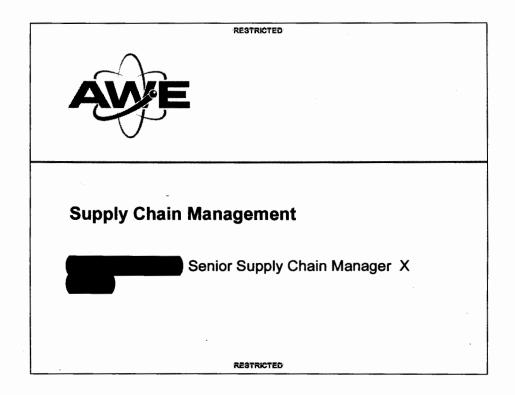


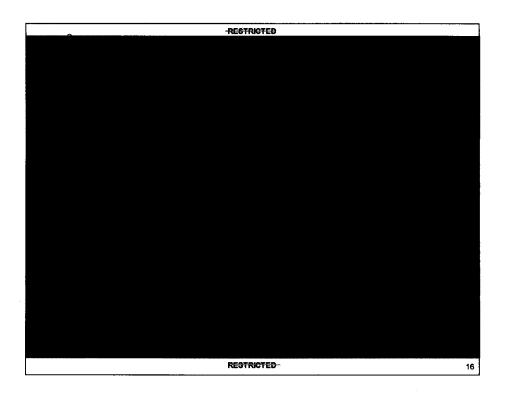


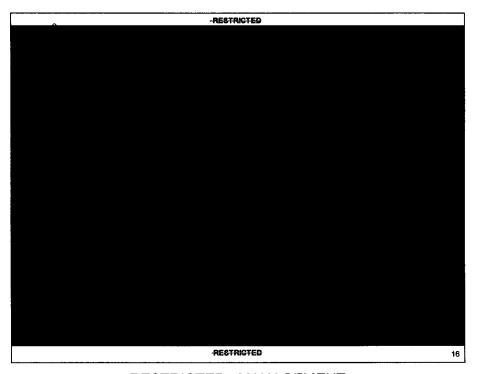












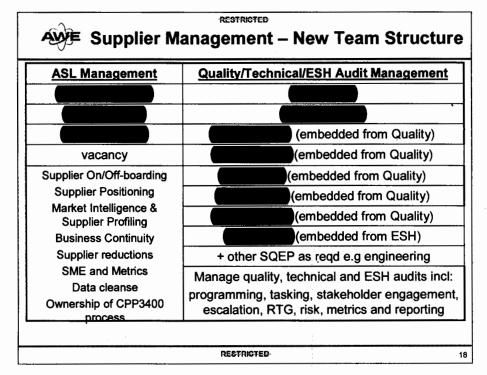
RESTRICTED - MANAGEMENT

Supplier Management

- SC21 introduced in Sept 2012 26 suppliers, 6 weekly scorecard review cycle
- Performance dashboards being implemented for 16 key suppliers:
 - Quarterly Board-to-Boards
 - Monthly reviews
- Data used to brief at Exec level and others, e.g MOD
- Revamped Supplier Competence Evaluation process
- QC Grades embedded across supply base
- Supplier Positioning tool being updated to include expanded business risk factors
- Bi-monthly supply chain updates to ONR at Regulatory Interface Meetings (RIM) now standard

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Issue 1





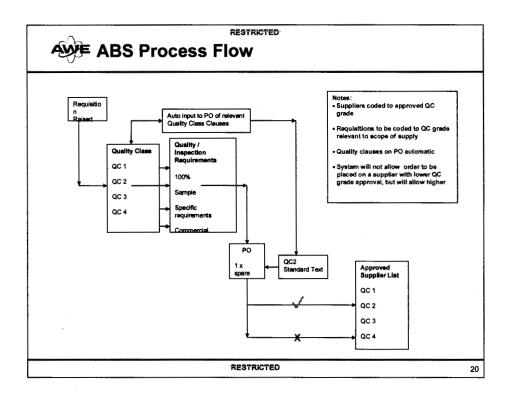
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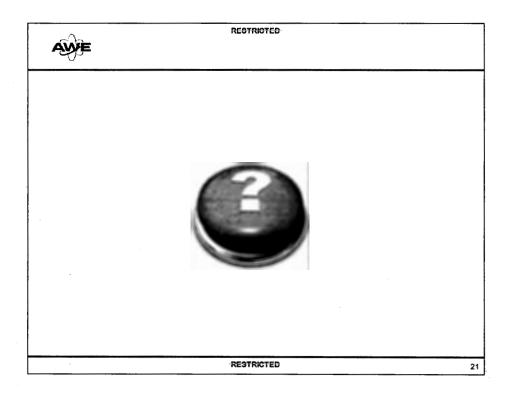
Procurement Process

AWE Business System:

- Requisitions now require a QC grading relative to the requirement
- Requisitioners only able to select a supplier linked to the appropriate QC grade and category code
- Standard quality deliverables can be selected in the requisition template and automatically pull-through to the PO
- Rolled out across all procurement activity, not just Capital Projects and maintenance spares

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Changes to Legislation & Standards

Current / Recent

H&S Legislation

- REACH*
- · Heavy Fuel Oil Regulations *
- Council directive 2013/59/Euratom *
- ADR 2013 *

H&S Codes of Practice updated

- · DSEAR *
- Asbestos (Contaminated Land) *
- · COSHH *
- · Legionella *
- · Workplace *

Environmental Legislation

• Site Waste Management Plan Regulations (repealed) *

ONR

· Impact of status change *

Potential/Future

H&S Legislation

- Explosives Regulations Oct 2014*
- CDM Regulations Review 2014*
- Petroleum Consolidation Regulations 2014*
- · Basic Safety Standards Directive (Under review)*

H&S Codes of Practice

- PUWER *
- Safe Use of Power Presses *
- Safe Use of Woodworking Machinery *
 Standards
- Quality Management System, ISO 9001:2015*
- Environmental Management System, ISO14001:2015 *
- Testing and Calibration, ISO 17025:2015*
- * Impact unknown at present * Minor impact * No Impact

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AWE

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Summary / Changes since last review

- Review of the Management Systems & Arrangements.
- Self-Assessment questionnaire
- Data demonstrates good alignment with existing improvement projects
- Continued support by the executive (influence & sponsorship)
- Increase in periodicity of Management Review
 - . Annual Review of Safety will be alignd with this periodicity
- Date of Next Risk and Governance Committee: Sept 2014
- Date of Next Annual review of Safety will align with Executive Management Review Meetings

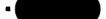
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ESH Performance Overview

Successes

- Progressed submissions for Capital Projects
- Approach to PRS
- Radiological end-point
- Improved performance metrics



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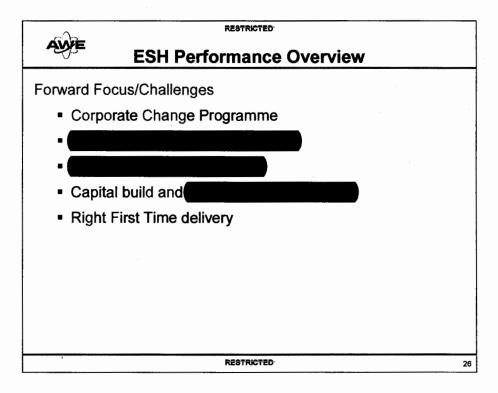
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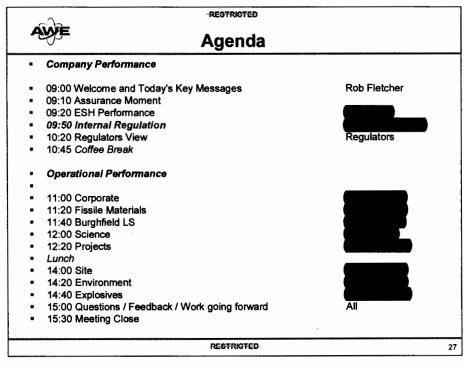
ESH Performance Overview

Regrets

- LI511
- Quality of Staged Safety Submissions
- Significant Abnormal Events
- Environmental Baseline
- Warning Letters & Enforcement notice

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AWE Internal Regulation

Annual Review of Safety Input



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Internal Regulation

Strategic Risks

- Integration of Warhead and Facility Safety
- "Right First Time" Submissions
- Major Project "Case for Safety"
- **Control Excursions**

 - Reporting culture

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Internal Regulation

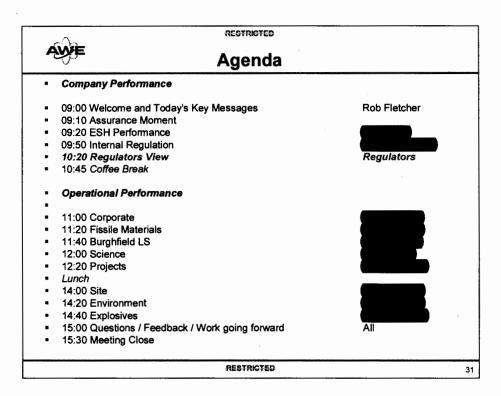
Positive Observations

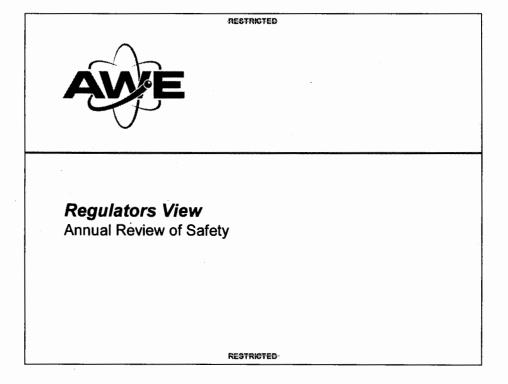
- Facility Management "New Blood" ...
 - Honest and searching Due Diligence reviews
- ... In a framework of supportive Leadership
 - Challenging of the status quo
 - Putting Safety first

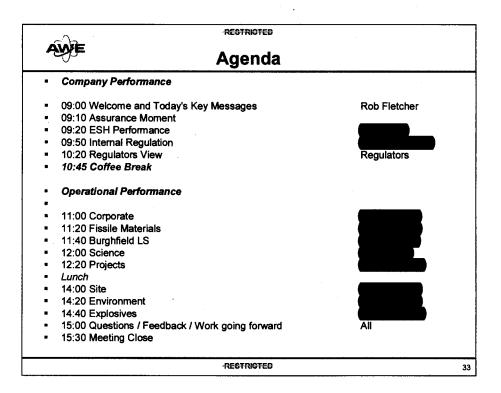


Exemplar of AWE and Regulator Bodies working together

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AVE A	
Agenda	
Company Performance	
09:00 Welcome and Today's Key Messages	Rob Fletcher
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• Lunch	
14:00 Site	
14:20 Environment	
14:40 Explosives	
 15:00 Questions / Feedback / Work going forward 	All
15:30 Meeting Close	
15:30 Meeting Close	



Corporate

Annual Review of Safety



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Corporate

Planned & Delivered Issues

Criticality

- Understanding ONR's expectation of OR's (TAG35)
 - 3 phase programme.
- identified as being poorly defined (and disconnected between key functions).
 - Revised arrangements developed.
 Golden thread identified & documented.
 - Programme of facility implementation.

Design Basis Analysis

- Procedures taken through a number of interactions prior to release.
 - Nuclear & explosive components separated to clarify scope / progress.
- > Extensive stakeholder engagement in order to reach resolution.

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Corporate

Successes

- Good interface & engagement
- L3 meeting structure streamlined
- .
- Common approach identified for revised arrangements.
- Facilitated workshop session.
- Review & assessment of identified 'watch list' items keep's oversight.

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Issue 1



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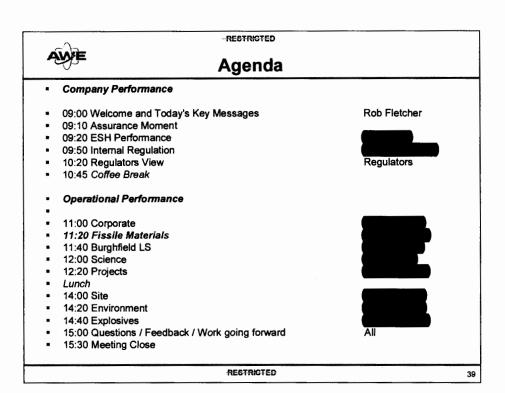
Corporate

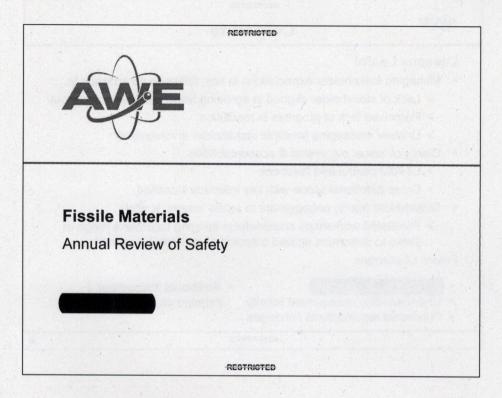
Lessons Learnt

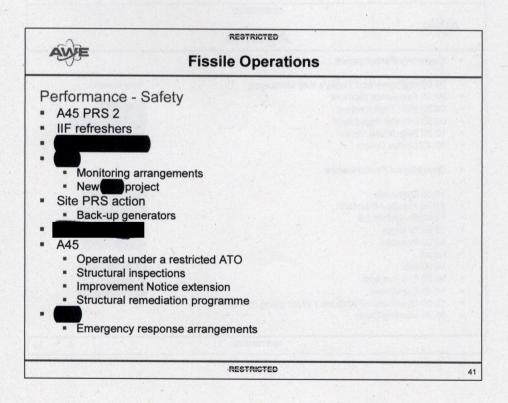
- Managing stakeholder expectations is key, failure to do so leads to...
 - > Lack of stakeholder aligned in agreeing issue resolution / closeout
 - > Perceived lack of progress in resolution.
 - > Unclear messaging (multiple stakeholder involvement)
- Clarity of 'issue' ownership & accountabilities
 - > L4 RIM control and feedback
 - > Cross functional scope with key interface identified.
- Stakeholder (early) engagement to agree 'issues' is vital.
 - > Facilitated workshops successful in bringing together a range of views to determine agreed outcomes - recorded & agreed.

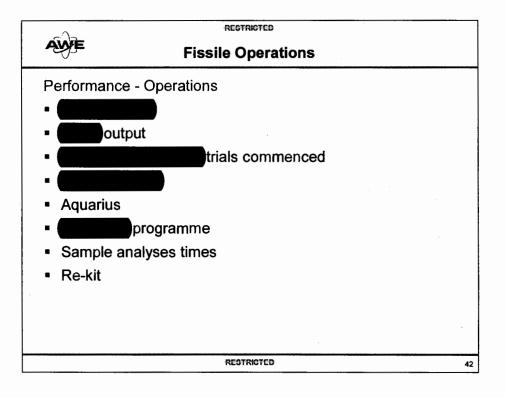
Future Challenges

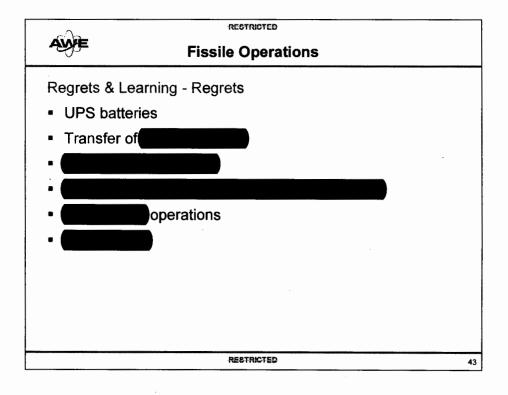
- Understanding assessment priority
- Additional 'throughput' / demand on RIM
- Functional requirements / changes













Fissile Operations

Regrets & Learning - Learning

- Working Together meetings
- Senior Manager Walkthroughs
- Facility Monitoring Tools
 - Process surveillance
 - Process walk-downs
- 6S
- Materials removals programme
- Value Stream Mapping
 - Casting process improvements
 - WIGs, dashboards, etc.
- Improved arrangements for moving fissile material

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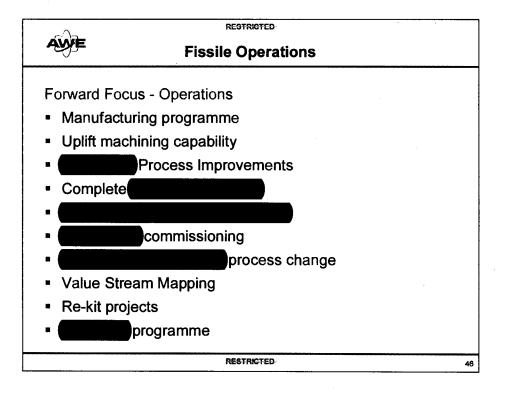
Fissile Operations

Forward Focus - Safety

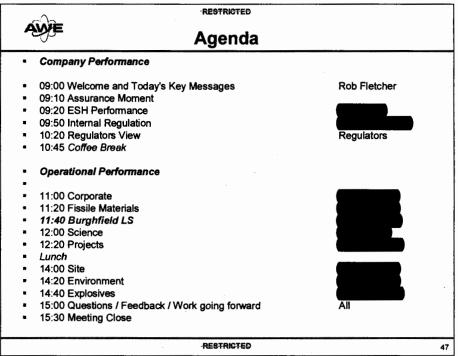
- Close out of the ONR Improvement Notice
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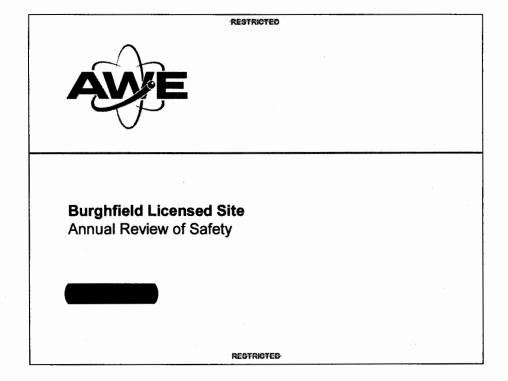
- Our ESH Culture assessment:
 - Supervisor skills improvements (including Supervision+)
 - Procedural compliance

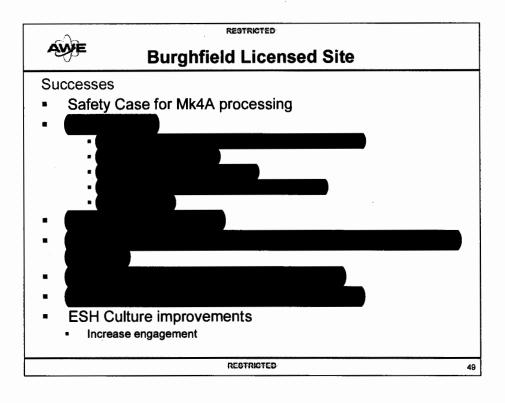
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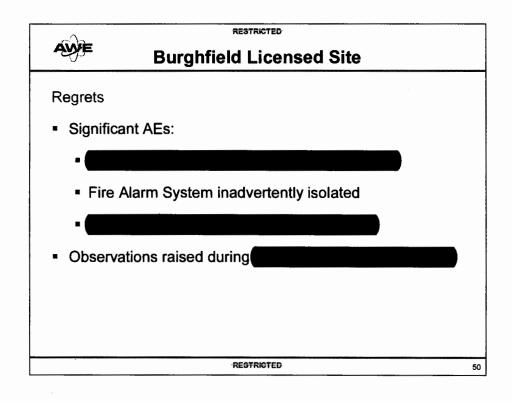


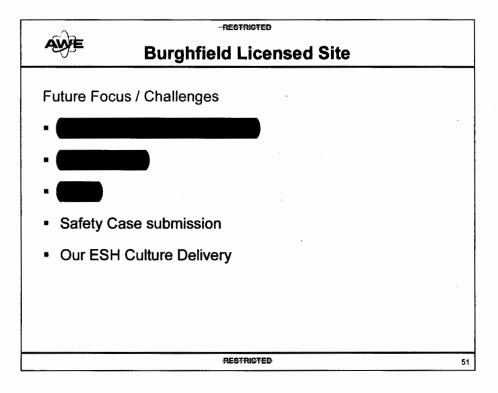
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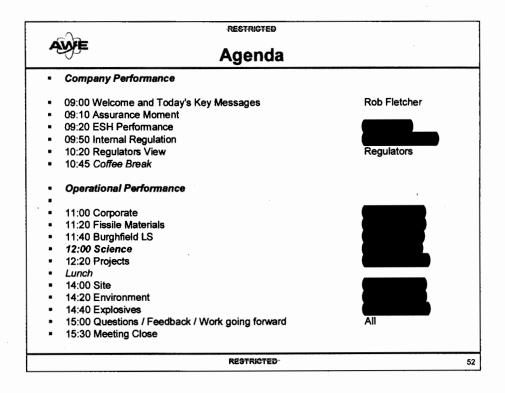


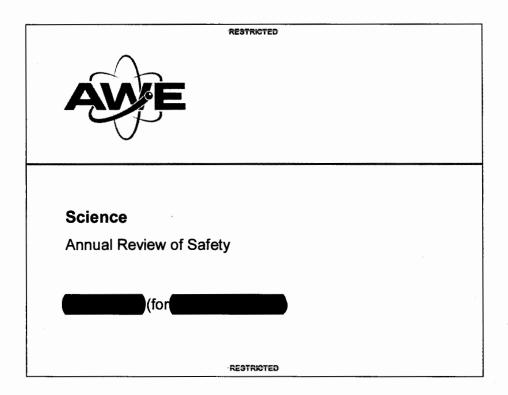




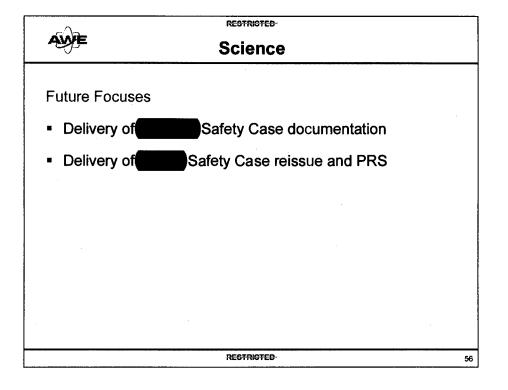






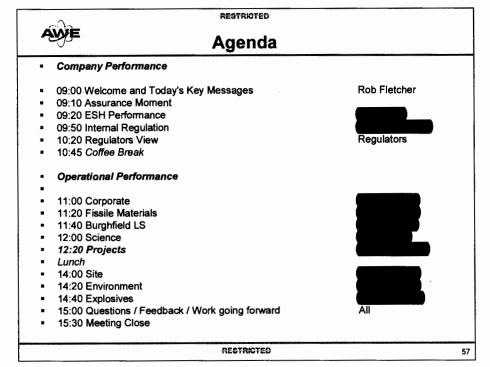


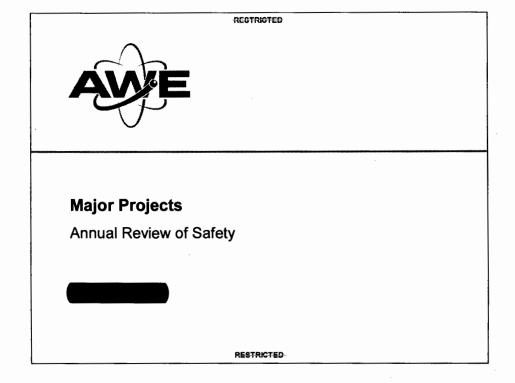
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AME	Science	
Regrets		
 Continuing delays over 	er delivery of the Safety Case	
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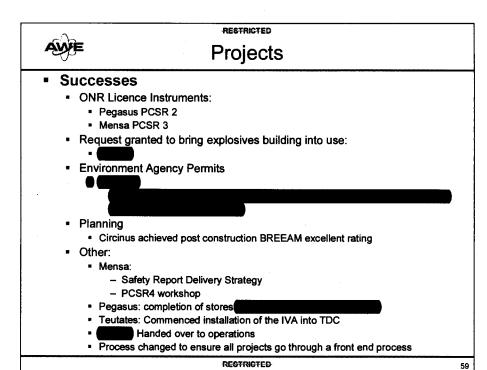


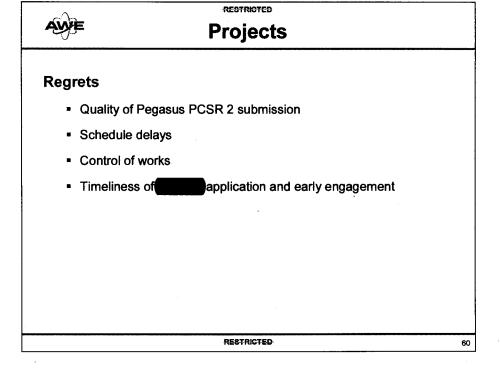
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Issue 1











Projects

- Future Focus / Challenges / Forward Programme
 - Progress with Mensa and Pegasus
 - Circinus:
 - Licence Variation Sept 14
 - Release of building- Dec 14
 - phase 3 into operation
 - Potential variation to the Carbon permit (possible movement of furnace to new facility)
 - Delivery of improvement actions from joint RLI exercises to ensure right first time delivery and predictable permissioning of activities.
 - Improvement plan
 - Re-baselining Activities
 - Organisation

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Supply Chain Management



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Supply Chain Management

Assessing Supplier Capability

- Growth in assessment team to meet demands.
- Implemented Supplier assessment programme against defined QC grading.
- Scoring to enable improvement or discard.
- Reporting to inform the Executive team.
- Analysis to identify themes.
- AWE awareness and compliance to QC requirements

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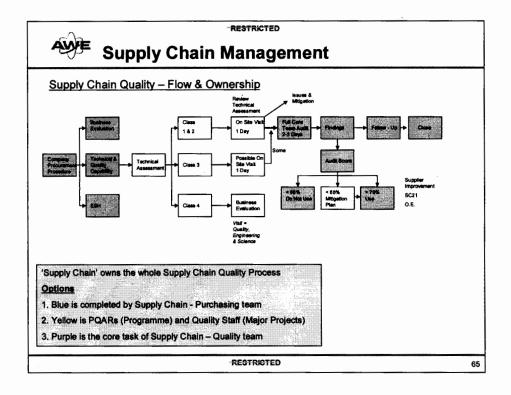
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Supply Chain Management

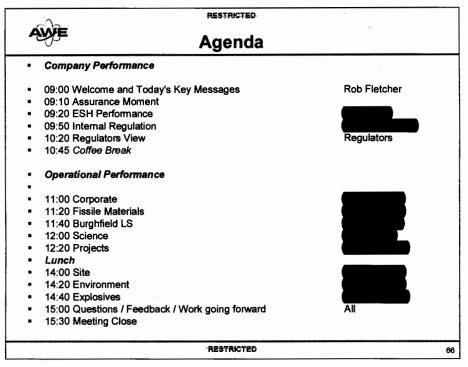
Monitoring Supplier Performance

- SC 21Introduced in Sept 2012.
- 26 suppliers currently in the programme.
- · Scorecards / Monthly Dashboards.
- Performance, quality & relationship strength are measured.
- Data are used to inform internal reporting and Visual Management Boards.

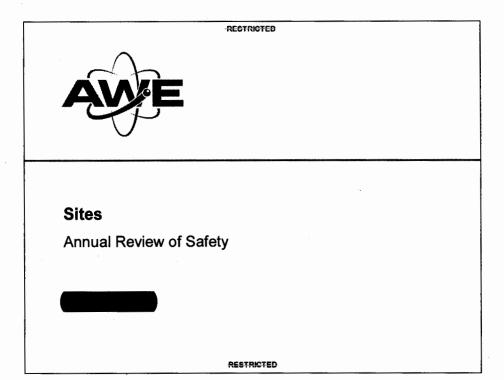
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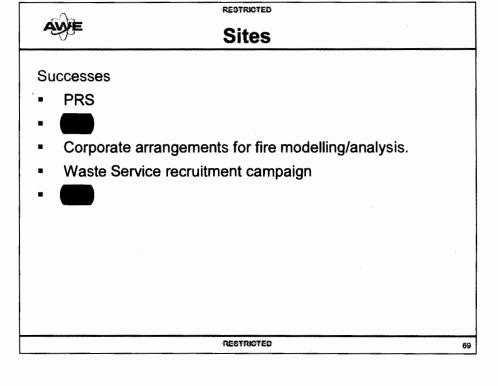


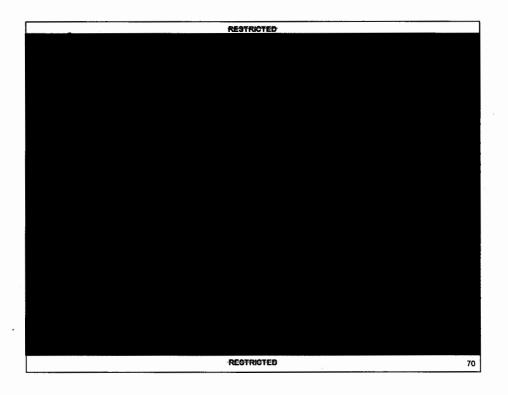
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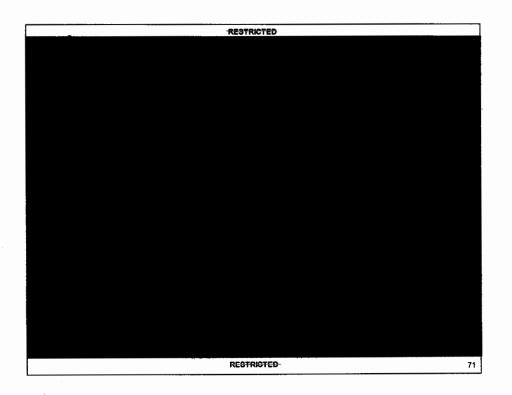


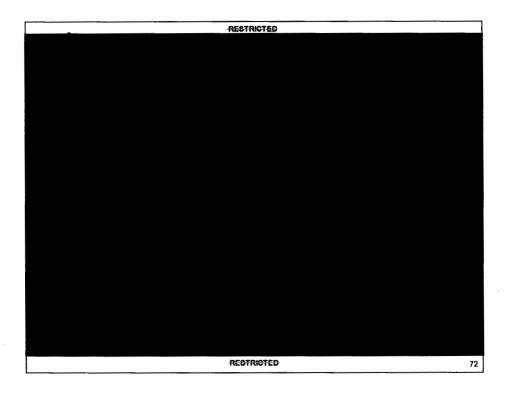
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Agenda		
Company Performance		
09:00 Welcome and Today's Key Messages	Rob Fletcher	
09:10 Assurance Moment		
09:20 ESH Performance		
09:50 Internal Regulation		
 10:20 Regulators View 	Regulators	
10:45 Coffee Break		
Operational Performance		
•		
11:00 Corporate		
11:20 Fissile Materials		
11:40 Burghfield LS		
■ 12:00 Science		
 12:20 Projects 		
- Lunch		
• 14:00 Site		
14:20 Environment		
14:40 Explosives	All	
15:00 Questions / Feedback / Work going forward	All	
15:30 Meeting Close	•	
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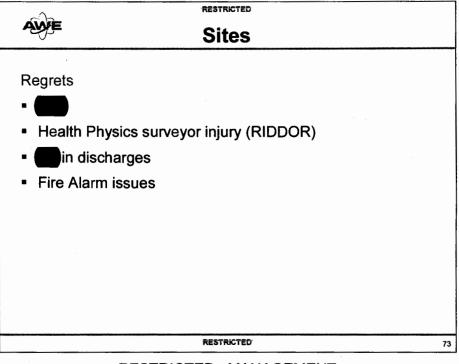


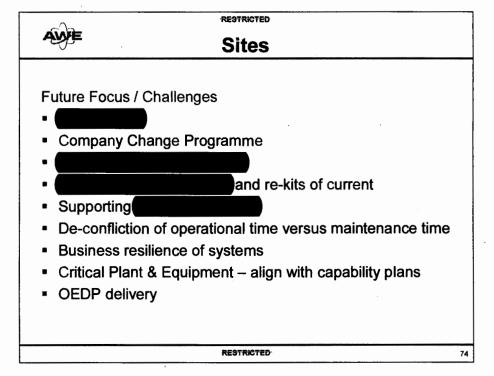






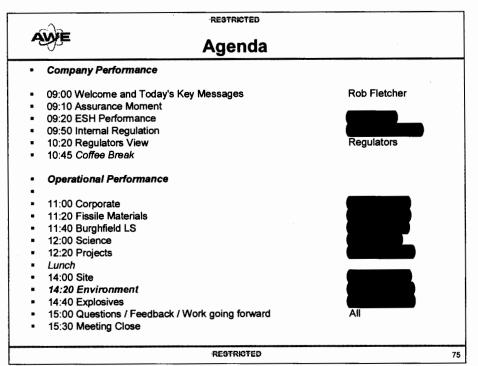


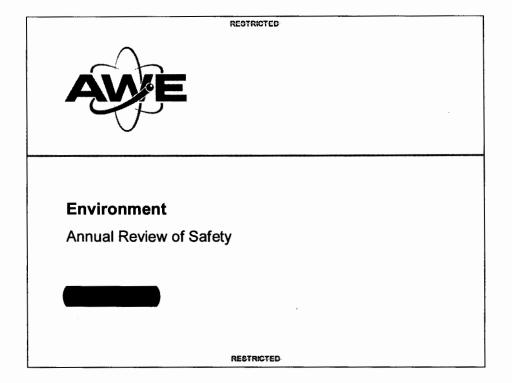




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Issue 1







Environment

Planned & Delivered Work

Permit Compliance

- Delivery of Improvement & Information Requirements
 - Organisational Baseline Statement & supporting Organisational Change documents were delivered by the 01 Nov 13 deadline.
 - Corporate Aqueous Waste BAT on track for delivery
 - ➤ Environment Action Plan 24 of 25 improvement actions delivered

Permit Variations

- Permit variations that have been granted within the period include:
 - Combustion Activities permit (Sept 2013)

Best Available Techniques

- Significant BATs presented to EA
 - > Environmental Monitoring BAT delivered Aug 2014.
 - > Tritiated Waste Store BAT

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Environment

Successes

- Improved engagement & communication
- Completion of the Environmental (EPR10) Baseline information & improvement requirement
- Overall compliance with the environmental permits held is good
- Improvements in management of mobile radioactive apparatus & sealed sources
- The disposal of radioactive waste Permits & CEARAS documents for Aldermaston and Burghfield varied
- RWMA themed inspection identified a range of good practices.

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Environment

Lessons Learnt

- Warning Letter & Enforcement Notice served August 2013
- Advisory letter Burghfield outfall 5 suspended solids
- 2x RASCAR non-compliance findings:
 - > Joint Waste Inspection; &
 - > Rad Waste Management Arrangements Inspection (Org. Baseline)
- LRQA audit feedback
- Late engagement on project Combustion Permit variation
- eFacility (environmental database)- pace of addressing replacement

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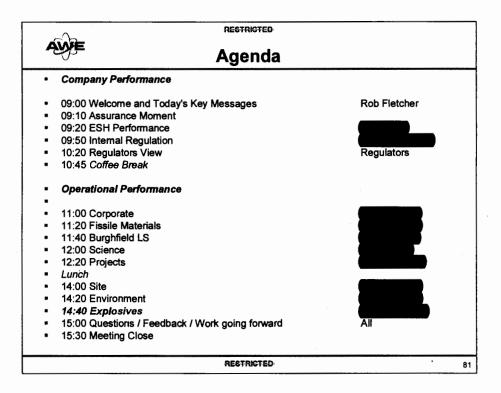
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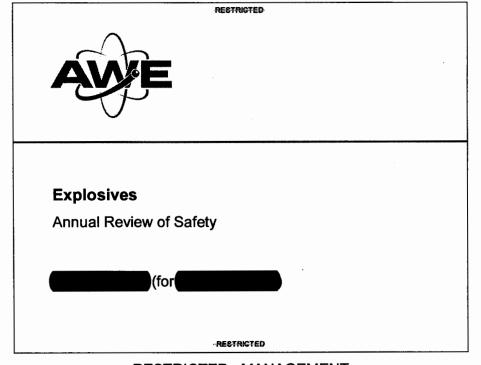
Future Focus / Challenges

- Trade waste network project and delivery of Corporate Aqueous Waste
- Combustion Permit variation for Project (additional DRUPS).
- Application for new Carbon Activities Permit (TBC).
- Company reorganisation and the application of the Environmental (EPR10) Baseline.
- Improved demonstration & application of Best Available Techniques (BAT).
- Early engagement with environmental specialists when applying for new permits or permit variations.

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Explosives

- Successes
 - · Variations in Licences agreed with Regulator
 - Increased emergency response capability
 - Including introduction of remotely operated vehicle
 - Handover of and and following refurbishment
 - Maintained compliance with Explosives Licence

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Issue 1



RESTRICTED **Explosives**

Regrets

- Time associated with Licence Variations (too long)
- Not always recognising when early engagement with the Regulator is required/advisable



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Explosives

- Future Focus / Challenges / Forward Programme

 - Successful inert and live commissioning of Circinus
 - Risk: Explosives Licence for Circinus
 - Working closely with the licensing inspector to secure

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