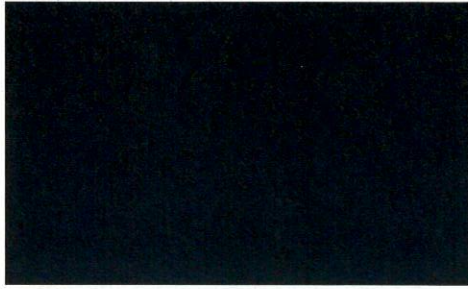




Ministry
of Defence



FOI2020/06157

E-mail: Navysef-foimailbox@mod.gov.uk



24 August 2020

Dear ,

Release of Information

Further to our letter of 24 July 2020, I am now in a position to provide you with a substantive response to your request for the following information:

'I am sending this request under the Environmental Information Regulations.

- 1) Please state the number of radiation leaks or any adverse incidents involving radioactive sources or fuel incidents, at Devonport dockyard relating to nuclear submarines, active or those removed from service.
- 2) Please state the amount of radiation, or radioactive substance leaked in each incident.
- 3) Please provide the time, date, and incident log report for each case, as well as action taken to resolve each case.

Please provide information from 2000 to date, or as far back as any centralised recording of this issue goes.'

Your enquiry has been considered to be a request for information in accordance with the Environmental Information Regulations (EIR) 2004.

As explained in our interim response, a search was completed within the Ministry of Defence (MOD) and it was confirmed that information in scope of your request was held by the Department. However, in the same correspondence, it was also explained that it was considered that some of the information you were seeking may fall within the scope of Regulation 12(5)(a) of the EIR.

Regulation 12(5)(a) provides an exception to disclosing requested information if it would adversely affect Defence, National Security or Public Safety.

'Defence' means protecting a nation against attack. This part of the exception will usually cover information that, if disclosed, would adversely affect the capability, effectiveness or security of the Armed Forces. 'National Security' relates to some Defence matters, but will extend to wider non-military, constitutional or economic security, such as information about royal protection. 'Public Safety' may be interpreted widely. The exception covers information that, if disclosed, would adversely affect the ability to protect the public, public buildings and industrial sites from accident or acts of sabotage; and where disclosing information would harm the public's health and safety.

As Regulation 12(5)(a) is a qualified exemption, it has been necessary to conduct a Public Interest Test to assess whether release of the information would adversely affect the capability, effectiveness or security of the Armed Forces, National Security relating to some Defence matters or Public Safety. The Department has conducted the Public Interest Test for this exemption and, after careful consideration of the information, has concluded that the public interest in disclosure outweighs the public interest in maintaining the exemptions at Regulation 12(5)(a) of the EIR. Therefore, the information to answer all parts of your request is enclosed with this letter.

Please be advised that the information provided is for the MOD's operations at HM Naval Base Devonport only and does not include Devonport Royal Dockyard Limited. I should further advise you that no member of the public was endangered as a result of any of the three events.

If you have any queries regarding the content of this letter, please contact this office in the first instance.

If you wish to complain about the handling of your request, or the content of this response, you can request an independent internal review by contacting the Information Rights Compliance team, Ground Floor, MOD Main Building, Whitehall, SW1A 2HB (e-mail CIO-FOI-IR@mod.uk). Please note that any request for an internal review should be made within 40 working days of the date of this response.

If you remain dissatisfied following an internal review, you may raise your complaint directly to the Information Commissioner under the provisions of Section 50 of the Freedom of Information Act. Please note that the Information Commissioner will not normally investigate your case until the MOD internal review process has been completed. The Information Commissioner can be contacted at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Further details of the role and powers of the Information Commissioner can be found on the Commissioner's website at <https://ico.org.uk/>.

Yours sincerely

Navy Command Secretariat - FOI Section

'I am sending this request under the Environmental Information Regulations.

1) Please state the number of radiation leaks or any adverse incidents involving radioactive sources or fuel incidents, at Devonport dockyard relating to nuclear submarines, active or those removed from service.

The number of events from 2000 to date resulting in a release of a radioactive substance from a nuclear submarine at HM Naval Base Devonport is three. There were no adverse incidents involving radioactive sources or fuel incidents at HM Naval Base Devonport relating to nuclear submarines with effects on the environment.

2) Please state the amount of radiation, or radioactive substance leaked in each incident.

- Event A) Estimated 288 litres released to the environment.
- Event B) Estimated 0.5 litres spill on submarine outer casing - no release to environment
- Event C) Estimated 3 litres released to the environment

3) Please provide the time, date, and incident log report for each case, as well as action taken to resolve each case.

Event	Time	Date	Incident log report	Summary of actions to resolve and prevent recurrence.
Event A	00:15	07 Nov 08	A hose between the submarine and the Effluent Tank on the jetty split discharging liquid to the environment.	<ul style="list-style-type: none"> • Revisions to arrangements to support the hose when fitted. • Introduction of independent inspections of hose supporting arrangements prior to use. • Technical review of the effluent transfer system to prevent system over-pressurisation.
Event B	10:10	04 Apr 14	During removal of a hose and following a 200-litre water flush, approximately 0.5 litres of water overflowed from a carboy out of its catchment area and onto the submarine casing (no release to the environment).	<ul style="list-style-type: none"> • Minor spill cleaned up with no release to the environment. • Procedural revisions to reduce likelihood of introducing excessive effluent into the carboy. • Introduction of a catchment around carboy to reduce likelihood of spill onto submarine casing.
Event C	06:44	22 Apr 18	A hose split between the submarine and the Effluent Tank on the jetty during discharge operations.	<ul style="list-style-type: none"> • Review of effluent transfer system valve locking arrangements. • Revision to hose pressure test requirement ahead of each discharge. • Fitting of pressure relief system at this berth.

