

Transport and Environment Committee

10.00am, Tuesday 18 March 2014

Nuclear Submarine Dismantling at Rosyth: Environmental Statement Consultation

Item number	7.14
Report number	
Wards	All

Links

Coalition pledges	
Council outcomes	C18, C21
Single Outcome Agreement	SO4

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Executive summary

Nuclear Submarine Dismantling at Rosyth: Environmental Statement Consultation

Summary

The UK government through the Ministry of Defence (MOD) decided that Rosyth Royal Dockyard will be used to dismantle the seven decommissioned nuclear powered submarines currently stored afloat at the base.

As part of the regulatory approval process, Babcock, the company that will carry out the dismantling work to remove the radioactive material must prepare an Environmental Statement. Their statement details the work, which will be done in two stages, with initial removal of low level nuclear waste followed at a later date by the intermediate level waste. This will require a national waste disposal facility to be identified.

The Environmental Statement also assesses the potential for environmental impact and details mitigating measures that will be put in place to ensure risks are as low as reasonably practicable.

Recommendations

- 1 It is recommended that Committee notes the content of this report and approves submission of the consultation response at Appendix1.

Measures of success

The submarine disposal process is concluded safely.

Financial impact

There are no financial implications arising from this report.

Equalities impact

This report proposes no change to current policies or procedures and as such a full impact assessment is not required. The contents have no relevance to the public sector Equality Duty of the Equality Act 2010.

Sustainability impact

Dismantling of the submarines is not expected to increase radioactive discharges to the environment above current permitted levels. There is likely to be a local environmental impact due to noise from cutting up the hulls and other industrial activity, but this will not be greater than existing dockyard operations.

Consultation and engagement

This report is in response to a public consultation. The Transport service has been consulted on traffic movements in the Council area.

Background reading / external references

Public consultation on the request for consent to dismantling of seven nuclear submarines at Rosyth Royal Dockyard (Appendix 3)

<http://www.hse.gov.uk/consult/condocs/rosyth-royal-dockyard/index.htm>

http://www.edinburgh.gov.uk/download/meetings/id/39389/item_7_16-nuclear_submarines_dismantling_at_rosyth

http://www.edinburgh.gov.uk/download/meetings/id/34897/item_7-consultation_on_proposals_to_dismantle_nuclear_submarines

<https://www.gov.uk/government/publications/submarine-dismantling-project-interim-storage-of-intermediate-level-radioactive-waste>

Nuclear Submarine Dismantling at Rosyth: Environmental Statement Consultation

1. Background

- 1.1 Babcock who operate Rosyth Royal Dockyard have been contracted by the Ministry of Defence (MOD) to dismantle seven nuclear submarines stored afloat at Rosyth. The nuclear material remaining on the submarines will be removed and the submarines made safe for further break-up.
- 1.2 Previous reports on the dismantling were made to Transport and Environment Committee on 21 February 2012 and 4 June 2013.

2. Main report

- 2.1 Babcock who operate Rosyth Royal Dockyard have been contracted by the MOD to dismantle seven nuclear submarines stored afloat at Rosyth. The nuclear material remaining on the submarines will be removed and submarines made safe for further break-up.
- 2.2 As part of the approval process the contractor Babcock are required to prepare an Environmental Statement for submission to the Office for Nuclear Regulation under the auspices of the Health and Safety Executive. The Environmental Statement is also evaluated by Scottish Environment Protection Agency (SEPA) and submitted to general public consultation.
- 2.3 The dismantling at Rosyth will take place in two stages. Stage 1 will involve docking of the submarine and removal of all low level nuclear waste within the reactor compartment. The reactor pressure vessel and the primary shield tank will be segregated and blanked from the primary steam generating circuits and remain in situ. The submarine hull will then be restored to the appropriate standard to allow further afloat storage. After flood-up of the dock, the submarine will be handed back to MOD control and the vessel will return to a float storage in the non tidal basin at Rosyth.
- 2.4 During Stage 2, when the intermediate level nuclear waste (ILW) storage solution is agreed by national government, the submarines will be re-docked in sequence over a number of years and the reactor pressure vessel and other radioactive components removed. In February 2014 MOD announced that the following have been shortlisted as potential storage sites for the intermediate nuclear waste:
 - Aldermaston (Berkshire)
 - Burghfield (Berkshire)

- Chapelcross (Dumfriesshire)
 - Sellafield (Cumbria)
 - Capenhurst (Cheshire)
- 2.5 Babcock at Rosyth has an Environmental Monitoring Programme which checks shoreline radiation dose-rate measurements, sediments, seaweed and shellfish and airborne sampling for gaseous emissions. The results are reported monthly to SEPA. In addition SEPA have their own radioactivity monitoring programme which is carried out by the Centre for Environment, Fisheries & Aquaculture Science based in Weymouth in the South of England
- 2.6 The Council is a member of the Standing Committee of Local Authorities on the Fife Estuary which, through an officer working group, monitors the Fife estuary for radioactive contamination from both Torness and Rosyth. The Council Scientific Services has its own radioactive monitoring equipment and tests the Council's samples and those of neighbouring local authorities.
- 2.7 The Babcock Environmental Statement has reviewed a possible impact area of up to 5km from the base which includes parts of South Queensferry – see Appendix 2. Potential impacts include noise, vibration and light. It is not anticipated that any of these will be any greater than the current levels produced by activities currently undertaken in the dockyard. Any additional lighting will be at low level in the dock. An additional large crane will be required at the dockside for lifting purposes so this may have some visual impact.
- 2.8 The on-going impact of transport on South Queensferry associated with the submarine dismantling project is likely to be minimal since this work is a small part of the activity within the dockyard. Some temporary disruption on a six monthly basis is possible during stage 2 of the removal process if the reactor pressure vessel is to be stored at a site south of Rosyth. Rosyth will not be a storage site for removed reactor pressure vessels or ILW.
- 2.9 The submarine dismantling programme, subject to regulatory approvals, is expected to start in January 2016.

3. Recommendations

- 3.1 It is recommended that Committee notes the content of this report and approves submission of the consultation response at Appendix1.

Mark Turley

Director of Services for Communities

Coalition pledges**Council outcomes** C18, C21**Single Outcome Agreement** SO4**Appendices****Appendix 1**

Proposed Consultation Response on the request for consent to dismantling of seven nuclear submarines at Rosyth Royal Dockyard a response by City of Edinburgh Council

Appendix 2

Map of area reviewed in the Babcock Environmental Statement

Appendix 3

Public consultation on the request for consent to dismantling of seven nuclear submarines at Rosyth Royal Dockyard

Appendix 1

Public consultation on the request for consent to dismantling of seven nuclear submarines at Rosyth Royal Dockyard a response by City of Edinburgh Council

The City of Edinburgh Council

1. Welcomes the opportunity to comment on the consultation.
2. Would wish to be listed as a stakeholder since the zone of investigation for the Environmental Statement includes South Queensferry which lies within the boundary of the City of Edinburgh Council.
3. Requests that any notices that may be issued to residents in Fife regarding any unusual process that may cause disturbance also be issued in the same way to residents of South Queensferry.
4. Requests that any notices to Fife Council or other regulating authorities regarding radioactive spillages or accidents also be reported to the City of Edinburgh Council.
5. Requests that any notices or applications to Transport Scotland or other transport authorities to move unusual loads over the road network which may cause disruption be also notified to City of Edinburgh Council at this address abnormalloadsbridges@edinburgh.gov.uk

Appendix 2

Map of area reviewed in the Babcock Environmental Statement



Public consultation on the request for consent to dismantling of seven nuclear submarines at Rosyth Royal Dockyard

Background

Since the Nuclear Reactors (Environmental Impact Assessment for Decommissioning) Regulations (EIADR) entered into force in 1999 the decommissioning of nuclear power stations and other nuclear reactors within the scope of EIADR may only proceed with consent from the Office for Nuclear Regulation (ONR). To obtain consent the licensee of the nuclear reactor must submit to ONR an Environmental Statement (ES), which presents a detailed environmental impact assessment for the proposed decommissioning project and the mitigation measures to be used to avoid or minimise any significant adverse impacts on the environment, together with a non-technical summary of this information. This is considered by ONR during an extensive public consultation. If the project is considered acceptable ONR grants consent for the decommissioning project. Further [information and guidance on EIADR^{\[1\]}](#) is available.

Application for consent to dismantle nuclear submarines

Rosyth Royal Dockyards Ltd. (RRDL) have applied to obtain a consent to begin the dismantling project in January 2016.

For the application for consent RRDL have submitted the following documents:

- an environmental statement , which presents a comprehensive environmental impact assessment for the decommissioning project;
- a non-technical summary of the environmental statement;

Both of which are available on the [documentation page^{\[2\]}](#). You can also request these documents in writing from:

Rosyth Royal Dockyard Ltd.
Babcock International Group
Rosyth Business Park
Rosyth
Dunfermline

Fife

KY11 2YD

- Babcock International Group website [\[3\]](#)

Public consultation

ONR is holding a formal 3-month consultation period in order to provide the opportunity for interested parties to comment upon Babcock's application and decommissioning project. Consultees are invited to comment upon any aspect of the dismantling project, particularly the environmental statement that contains the environmental impact assessment for the proposed decommissioning project and the mitigation measures to be used to avoid or minimise any significant adverse impacts on the environment.

At the end of the consultation, the comments received are collated and made publicly available, although any comments submitted can be treated anonymously on request. Alternatively, you may provide comments in person at HSE's Knowledge Centre in Bootle, and via public libraries local to Rosyth.

If required, you may ask ONR any questions of clarification before responding formally to the consultation.

Next steps

After careful consideration of the comments received, ONR will publish its decision on issuing consent in the form of a Decision Report, which will be circulated to consultees and published.

This consultation will run for a 3-month period from 22 January and end on 21 April 2014. Late comments are unlikely to be considered.

Health and Safety Executive

ONR - EIADR team

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Link URLs in this page

1. information and guidance on EIADR
<http://www.hse.gov.uk/nuclear/eiadr.htm>
2. documentation page
<http://www.hse.gov.uk/consult/condocs/rosyth-royal-dockyard/documentation.htm>
3. Babcock International Group website
<http://www.babcockinternational.com/>

