

Memorandum

Large
and
ASSOCIATES

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To: **Gareth Rowlands** DE&S Policy Secretariat (Submarines) M3185-A45
From: **John H Large** 23 March 2010
Cc: David Hoadley – SCANS

Subject: **SCANS – ADDITIONAL FOI REQUEST RELATING TO M3185-A5 & A15**

Thank you for your letter of 19 March 2010 ([101131-004](#) & [143852-002](#)), together with the attachments i) DNSR [Foxwater 09 Assessment](#) and ii) [DNSR Review of BSS](#).

With regard to these attachments I have a number of further requests:

A) DNSR [Foxwater 09 Assessment](#) DNSR/20/12/2 23 January 2009

Referring to the letter text, please provide a copy of

- a) the Exercise Instruction NBC 231/1 of 19 December 2008 referred to in para 2.

Referring to Annex A

- b) with respect to the para 2 statement that the “*. . radiological consequences of the release appeared to be somewhat greater than intended . .*”, please provide further details of the radiological consequences

- i) anticipated for the exercise storyboard; and
- ii) as the post submarine event scenario actually developed in the exercise.

For both i) and ii) a collective dose assessment and bands of individual dose exposure would be helpful for my comparison.

- c) Explain why and in which respects the increased radiological of the b)ii) foregoing consequences of the release “*. . is an increasingly sensitive area given the reduced accident consequences currently under assessment.*”.
- d) Para 8a) and b) refers to the ambulance trust personnel being delayed, moving forward to a casualty collection point and, then, being withdrawn at the declaration of Category 2 so, from this, did the ambulance trust personnel accrue any increment(s) of additional dose over than that planned for in the storyboard scenario – please provide further information on
 - i) the time delay between the declarations of Category 1 and Category 2 severities; and for the ambulance personnel;
 - ii) anticipated storyboard dose; and
 - iii) the dose as the exercise scenario actually developed.

Please frame your response with reference the radiation worker status of the South Central Ambulance Service employees (see <http://www.largeassociates.com/3185%20SOTONSAFE/large-solent%20coalition%20against%20nuclear%20ships-nov2009.pdf>) and, specifically, Regulation 14 of the *Radiation (Emergency Preparedness and Public Information) Regulations 2001*.

- e) When referring to *Intervention Management* of paras 10 and 11, please confirm or otherwise if the greater radiological consequences referred to in A) b)ii) above, arose from delays incurred in the first and second sealing operations of the hatch of the ‘secondary’ containment compartment(s) of the stricken submarine.

B) DNSR Operational BSS - Review DNSR/20/12/2 29 July 2008

Referring to para 4 of the main text in that the Berth Safety Statements “. . . *do not fully provide the level of safety substantiation expected*” and that “. . . *DNSR does not consider it appropriate to challenge the extant regulatory consent to use the UK Operational Berths*” with the aim that “. . . *the 2011 REPPiR Submissions will be supported by a significantly improved BSS*”

- a) please confirm or otherwise
 - i) if the present level of ‘*safety substantiation*’ remains short of DNSR expectations or
 - ii) if the significant improvement expected for 2011 has been brought forward and is now in proven and in place at Southampton.

I would appreciate if your response could refer to item 16 of the REPPiR Regulatory Assessment jointly issued by NSE and DNSR of 30 April 2009 (see <http://www.largeassociates.com/3185%20SOTONSAFE/MOD-HSE%20HIRE%20ASSESSMENT%2030%20April%202009.pdf>).

Referring to Annex A:

- b) identify the differences between the information in the classified and unclassified RoAs as stated in para 2c);
- c) provide the date of the population data census for Southampton as referred to in para 3;
- d) para 6c) refers to *Accident 63* consequences out to 1,400m but which seems to mismatch the findings of the 1st bullet point of paras 6 and 14 of the REPPiR Regulatory Assessment jointly issued by NSE and DNSR of 30 April 2009 (see <http://www.largeassociates.com/3185%20SOTONSAFE/MOD-HSE%20HIRE%20ASSESSMENT%2030%20April%202009.pdf>) – assuming that *Accident 63* is synonymous with the *Reference Accident* for all submarines

and classes, please confirm or otherwise if this apparent dichotomy continues to apply; and

- e) para 9 refers to the presented fire hazards at Southampton to be “*. . trivial and unsourced . .*” and that “*. .the conclusions presented in the Safety Statements for Southampton . . are particularly weak*” – please confirm or otherwise if these inadequacies of assessment continue to apply to the Southampton berth.

In your response it would be helpful if you refer to my order of itemisation above.

Finally, no doubt you will wish consider whether it is in the public interest to disclose the information requested. However, your past engagement of the test to my previous requests has not only introduced unjustified delays in your response but it has been underpinned with the supposition, or so it seems to me, that the information requested would not normally be disclosed. Indeed, I suggest that it is appropriate that you reconsider your position on this, particularly in that there is a presumption running through the Act that openness is, in itself, to be regarded as something which is in the public interest.