

Memorandum

Large
and
ASSOCIATES

Consulting Engineers

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To: **Michael Jennions** NII Information Officer

M3185-A8

From: **John H Large**

25 October 2009

Cc: David Hoadley – SCANS

Subject: **SOTONSAFE – WEDNESDAY 4 NOVEMBER PRESENTATION**

Large & Associates has been instructed by the Solent Coalition Against Nuclear Ships (SCANS) to present its interests at a forthcoming public meeting to be convened by Southampton City Council (SCC) on 4 November 2009. Confirmation of this instruction may be obtained from David Hoadley, Chair of the Coalition (dhoadley@phonecoop.coop).

The Coalition is concerned with the outcome of the NII's Regulatory Assessment and its outcome that that Off-Site Emergency Plan emergency zone is to be reduced to 1.5 km radius. With respect to this:

- 1) Generally, please provide me with a Catalogue or Index of the records and documents, etc., held by the HSE (NII) that relate to the Regulatory Assessment.
- 2) I refer to employed personnel attending an incident involving radioactivity under the *Radiation (Emergency Preparedness and Public Information) Regulations 2001* (REPIR), that is those who have been instructed to attend the incident as distinct from those who may be subject to radiation exposure when going about their normal duties not connected with the radiation incident. Such individuals instructed to become involved in the REPIR countermeasures, etc., might include employees of the local authority SCC, the local ambulance trust, police officers and Southampton Port, etc. In this respect and referring to the decision to reduced the REPIR off-site emergency zone to the area within a 1.5km radius from the incident site, I ask:
 - i) *Regulation 14* requires the operator (the Ministry of Defence) to notify HSE of the dose levels of individual employees going about their allotted tasks within
 - a) the area confined within the 1.5 km radius struck for the incident site; and
 - b) out to 10 km should the off-site area be extended?
 - ii) noting that these are likely to be expressed as p^{th} percentiles (ie *Average* or *Mean*, *Expectation Value E* and *99th*) in account of the variation of atmospheric stability prevalent at the time and following the incident, please provide me with a full copy of the projected dose rates and does exposures.
- 3) Now I refer to the joint HSE-DNSR letter of 30 April 2009 (HSE Ref D3NON 70059):
 - a) Please provide a copy of DNSR/3/3/3/1 dated 6 October 2008.

- b) Similarly, provide a copy of the relevant sections of HSE-NII NON 70033 dated 28 February 2009 as this might apply to the Z-berth at Southampton.
- c) Under para 3 b) reference is made to uncertainties associated with any quantification used to rule certain incidents as not being reasonably foreseeable – please provide a copy of the documentation identifying these uncertainties and the nature/type of incident that such apply to.
- d) Please provide a copy of the *Safety Improvement Notice* issued by CNNRP as this related to the 2005 submission.

As previously noted, this information requested is in support the presentation to be given the SCC on 4th November and, accordingly, it would assist if you are able to respond to this request and provide the information in good time before the presentation date. In your response, please refer to my order of itemisation above.

If you consider this to be a request under the *Freedom of Information Act 2000* then it is appropriate that I note to you that S10 of the Act requires you to respond '*promptly and in any event not later than the twentieth working day*' from the date of receipt of the request.