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14 February 1997

### NUCLEAR SITE LICENSING FOR AWE ALDERMASTON AND BURGHFIELD

In accordance with Section 3(3) of the Nuclear Installations Act 1965, I am directed by the Health and Safety Executive (HSE) to inform you that Hunting-BRAE Ltd, which manages and operates the Atomic Weapons Establishment (AWE) on behalf of the Secretary of State for Defence, has made applications to the HSE for the AWE sites at Aldermaston and Burghfield to be licensed under the Nuclear Installations Act 1965.

When AWE is licensed, we will be required to demonstrate to HSE's Nuclear Installations Inspectorate the continuing safety of our nuclear-related facilities at the Aldermaston and Burghfield sites. Specific licence conditions will form the framework of a safety management system appropriate for nuclear safety.

The Health and Safety Executive, the Environment Agency and other independent regulatory bodies will continue to regulate our non-nuclear operations and the Ministry of Defence will continue to evaluate our performance as required by the 1991 AWE Act.

Representations from public bodies whose statutory duties may be affected by the licensing of the sites may be made to [REDACTED] Health and Safety Executive, Nuclear Site Licensing Section, Nuclear Safety Directorate, St Peter's House, Balliol Road, Bootle, Merseyside, L20 3LZ, within three months from 14 February, 1997. Responses to consultation issues should indicate the site to which they relate. Should you wish to comment on other matters, the Health and Safety Executive has requested that you do so in a separate letter.

Working towards  
Nuclear Site  
Licensing for  
AWE Aldermaston  
and Burghfield

(A Paper by Hunting-BRAE Ltd)



FEBRUARY, 1997

2.

To assist you, I am pleased to enclose a paper, entitled "Working Towards Nuclear Site Licensing for AWE Aldermaston and Burghfield," which gives details about our licence application. It deals with those issues, such as safety, waste management, discharges, emergency plans and community liaison, which I understand are the key issues for local public bodies and the community. For your information, I also enclose copies of our 1995 Health, Safety and Environment Report, our 1995 Discharges and Environmental Monitoring Report, our "Working Towards Best Safety Practice" brochure and the Health and Safety Executive's follow-up report on safety management at AWE. If you require further copies or have any questions about our application, please contact [REDACTED] Manager Corporate Communications on 0118 982 6347, or at the address at this letter head.

*Yours sincerely*

[REDACTED]  
Chief Executive

## Reasons for Seeking Site Licences

Hunting-BRAE's applications for licensing under the 1965 Nuclear Installations Act for the Atomic Weapons Establishment sites at Aldermaston and Burghfield in Berkshire have been made in the interest of greater public confidence in the safety of our operations.

The Company will remain central to the United Kingdom's nuclear deterrent programme. It will continue to be responsible for all aspects of bringing nuclear warheads into service, including research and development, design, manufacture and assembly. It will also provide in-service support and safety assurance and, as weapons are retired, will undertake decommissioning and dismantling. There will be no change in the activities at the sites; it is the regulatory regime which is changing.

Once licences are granted, the Aldermaston and Burghfield sites will be subject to the same regulatory controls that apply to the civil nuclear industry. The AWE sites at Cardiff and Foulness do not require to be licensed as they do not fall within the scope of the Nuclear Installations Act.

Specific licence conditions for the Aldermaston and Burghfield sites will form the framework of a safety management system appropriate for nuclear safety and we will have to demonstrate to the Health and Safety Executive's Nuclear Installations Inspectorate the continuing safety of our nuclear-related facilities at the two sites.

The Nuclear Installations Inspectorate will regulate all our nuclear-related facilities. The Health and Safety Executive, the Environment Agency and other independent regulatory bodies will continue to regulate our non-nuclear operations. The Ministry of Defence will continue to regulate the design of nuclear weapons and evaluate our performance as required by the 1991 AWE Act.

## Background

Prior to 1993, the Aldermaston and Burghfield sites (together with sites at Cardiff and Foulness) were operated by the Ministry of Defence and were exempt from the licensing requirement.

In April 1993 the Ministry, as owner of the sites, placed a contract for their management and operation with Hunting-BRAE Ltd, a company jointly owned by Hunting Engineering Ltd, Brown and Root Ltd and AEA Technology. The Ministry confirmed in the contract that safety was to be of paramount importance.

On taking over management responsibilities Hunting-BRAE carried out a comprehensive review of safety and implemented a Safety Development Programme.

Because of the shift from Government to contractor-controlled operations, the Health and Safety Executive carried out its own independent review of safety management at AWE sites. It recognised that the sites were adequately safe but made recommendations for improvements.

Many of these had already been identified in our own Safety Development Programme. It is a measure of our success that we were able to complete all but one of the recommendations before the end of 1996 to the satisfaction of the Executive. The remaining recommendation requires the construction of a new building, planning for which is well under way.

The speed and efficiency with which the recommendations were met was fully acknowledged by the Health and Safety Executive in its follow-up report as "a significant achievement."

The Executive's first recommendation was that the Secretary of State for Defence should remove AWE's immunity from licensing requirements under the Nuclear Installations Act. By doing so, a system of health and safety regulations could be put in place which would be

demonstrably consistent with normal practice in the civil nuclear industry.

Subsequently, it was announced by the Secretary of State, in a statement to the House of Commons in March, 1995, that the AWE sites at Aldermaston and Burghfield would be licensed.

Nuclear site licensing is a welcome and important step for Hunting-BRAE. Since becoming responsible for the AWE sites in 1993, we have been working towards a system which is capable of independent audit and control. Licensing will provide a public demonstration of our overriding commitment to safety. It will give further grounds for confidence in our safety.

We at Hunting-BRAE are very proud of the health and safety improvements we have made. We have built on a system which was already fundamentally safe. With investment of effort, finance and manpower we have created a new safety culture at AWE.

#### Location of Sites

The locations of the Aldermaston and Burghfield sites are shown on the map at Annex A. The main gates of the sites are at Grid references SU599630 (Aldermaston) and SU677685 (Burghfield). The proposed licensed areas are, in the case of Aldermaston, bounded by the inner security fence and, in the case of Burghfield, an area within the security fence.

#### Safety Cases

'Safety cases' are a requirement of licence conditions. They examine the need for individual operations. They look at the possible consequences of errors and assess the risks to see how they might be eliminated, or reduced to as low a level as is reasonably practical.

We have examined all our operations to assess every credible hazard and risk and have

developed these assessments into full safety cases for every activity and process, as required by nuclear licensing.

#### Procedures to Ensure the Safe Disposal of Wastes

Low-level and intermediate-level radioactive waste and small quantities of typical industrial wastes are generated as a result of our operations. These are all disposed of via authorised routes and within strict limits. AWE does not generate any high level radioactive waste. We have developed a waste management strategy and have appointed waste minimisation officers in major facilities.

We are authorised by the Environment Agency to discharge very small amounts of appropriately-treated radioactive waste substances with extremely low radioactivity levels into the atmosphere and into water courses. Strict limits are set by our independent regulator to ensure that the effects of any discharges will be environmentally acceptable.

The relevant data are included in our annual Health, Safety and Environment Report and Discharges and Environmental Monitoring Report. We are committed to keeping our future discharges within authorised limits.

The effects of our discharges on the public have been and will remain negligible and will be well within national and international dose limits. This will continue to be confirmed by our own comprehensive monitoring and by the Environment Agency and the Ministry of Agriculture, Fisheries and Food, who carry out their own independent environmental monitoring around nuclear sites in the United Kingdom, including Aldermaston and Burghfield.

#### Emergency Plans

Although the chances of an accident are remote, we are prepared for any credible emergency.

We have our own fire and rescue services and engineering and radiological protection teams based on our sites. The Ministry of Defence Police are also an integral part of our emergency response organisation, providing continuous security protection as well as assistance to our specialist emergency teams.

At any time, 24-hours a day, these emergency teams are ready to deal with incidents.

Emergency plans have been prepared in conjunction with local authorities and the emergency services. They are lodged with local authorities and are available to members of the public on request. These plans deal with all credible emergencies which might have off-site consequences. We regularly exercise with local authorities and the civilian emergency services to test our emergency plans.

Our emergency arrangements for Aldermaston and Burghfield have been submitted to the Nuclear Installations Inspectorate for approval and are demonstrated to them in a programme of annual exercises. In addition, the Company has issued guidelines on emergency response arrangements to all local residents.

All of this is intended to ensure that, should an incident ever occur, the response would be rapid and

effective and would be co-ordinated with the local emergency services to protect public safety.

#### Community Liaison

The Company established a Local Liaison Committee in October 1993. The Committee meets three times a year and comprises representatives of all local authorities at parish, town, district, borough and county level. The Local Liaison Committee will continue after licensing to discuss matters of mutual interest. A representative of the Nuclear Installations Inspectorate will be invited to attend future meetings.

#### Representations

Representations from public bodies whose statutory duties may be affected by the licensing of the Aldermaston and Burghfield sites may be made to [REDACTED] Health and Safety Executive, Nuclear Site Licensing Section, Nuclear Safety Directorate, St Peter's House, Balliol Road, Bootle, Merseyside L20 3LZ, within three months from 17 February 1997.

Responses to consultation issues should indicate the site to which they relate. Should you wish to comment on other matters, the Health and Safety Executive has requested you should do so in a separate letter.



Hunting-BRAE Ltd manages and operates AWE on behalf of the Secretary of State for Defence

