

Our Ref: IW/KT/RS/Faslane/HMSSuperb

Commodore C Hockley
Naval Base Commander Clyde
HMNB Clyde
Faslane
Helensburgh
G84 8HL

If telephoning ask for:
Isabelle Watson

19 November 2007

Dear Commodore Hockley

**Radioactive Substances Act 1993 as amended (RSA93)
Letter of Agreement, June 1993
Incident of Inadvertent Discharge of Radioactive Effluent from HMS Superb August 2007**

I write further to the incident in August 2007 regarding the inadvertent discharge of liquid effluent which was potentially radioactive to the Gareloch from HMS Superb.

SEPA considers that a discharge of this nature is not in accordance with our letter of agreement dated 18 June 1993 for liquid discharges. Particularly, as the uncontrolled nature of the discharge did not allow for a sample of the effluent to be analysed and the activity of the discharge calculated prior to discharge. Additionally SEPA considers that MOD failed to apply "best practicable means" to the discharge.

SEPA notes that the estimated radioactive content of the discharge was solely due to a relatively small quantity of tritium and that the discharge would have been significantly diluted at the point of discharge. Consequently SEPA believes that there will be no discernable environmental or public health impacts from the discharge. However, SEPA wishes to express its concern that such an incident occurred and considers it to demonstrate inadequate radioactive waste management at HMNB Clyde, Faslane in this instance. MOD should inform SEPA in writing what actions are taken as a result of the incident with regard to preventing future occurrences.

The incident occurred on the 24 August however SEPA was not informed of the incident until the 30 August. This has highlighted a lack of formal notification requirements between SEPA and MOD in the case of incidents which may impact on the conditions of our agreement. This matter will be fully addressed by the pending MOD SEPA MOU and any updated agreement as a result of changes to the Base Radioactive Effluent Treatment Facility. However it should be noted that SEPA expects an RSA93 Authorisation Holder to inform SEPA without delay if the Authorisation Holder has reason to believe that disposal of radioactive waste is occurring, has occurred or might occur which does not comply with the limitations and conditions of the Authorisation held, and shall report the circumstances in writing to SEPA as soon as practicable thereafter. SEPA expects that MOD should follow the system in place for civil sector RSA93 Authorisation Holders. SEPA can be contacted at either at its main offices in East Kilbride and Stirling or via its pollution hotline on 0800 80 70 60. SEPA has a Radioactive Substances Specialist Officer on standby at all times.

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Commodore C Hockley
Naval Base Commander Clyde

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For incidents of this nature in the civil sector it is normal for SEPA to issue an RSA93 authorisation holder with a final warning letter, and while that is not relevant for the MOD I would expect you to treat this letter with an equivalent weight and seriousness.

SEPA is grateful for the co-operation of your staff during our investigation of this incident.

Yours sincerely

Isabelle Watson

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