

Commodore Doull
Naval Base Commander Clyde
Room 401 Lomond Building
HM Naval Base Clyde
Helensburgh
Argyll & Bute
G84 8HL

Our Ref: RS/NUC/FASLANE
You Ref: NBC 02/04/02

If telephoning ask for:
Isabelle Watson

25 June 2019

Dear Commodore Doull,

**Radioactive Substances Act 1993 Letter of Agreement
Addendum for General Effluent Disposal at HMNB Clyde**

1. In reference to our discussions (letters between the Ministry of Defence (MoD) and SEPA dated 10 and 30 October 2017, 19 April 2018 and 17 July 2018) on the disposal of general effluents from HMNB Clyde, this letter sets out the limitations and conditions agreed between MoD and SEPA in respect of the disposal of general effluents and ballast and trim water from HMNB Clyde, Faslane. This letter is an addendum to the existing letter of agreement covering the disposal of liquid and gaseous wastes from Faslane, dated 18 June 1993 (LOA93) and shall have effect from 1st of July 2019.
2. For the purposes of this agreement "General Effluents" means liquid wastes which are produced on board a submarine as part of normal operations that are not directly associated with submarine reactor plant containing tritium with a concentration not greater than 1 Bq/ml.
3. For the purposes of this agreement "Ballast and Trim Water" means seawater containing tritium pumped from compensating and trim tanks to sea to manage buoyancy and manoeuvrability.
4. For the purposes of this agreement "relevant sewer" means
 - a) a public sewer; or
 - b) a private sewer which leads to a sewage treatment works that
 - i) has the capacity to handle a minimum of 100m³ of sewage per day; and
 - ii) discharges treated sewage only to the sea;and "sewer", "public sewer", "private sewer", "sewage treatment works" and "sewage" have the same meanings as in the Sewerage (Scotland) Act 1968.
5. In addition to the disposal route specified in paragraph 4 of LOA93, MoD shall ensure that General Effluents are disposed of to a relevant sewer or the sea and only in accordance with legislation that relates to the non-radioactive properties of these effluents.
6. The MoD shall not dispose of General Effluents in which the total activity of tritium exceeds 10 Gigabecquerels in any 12 consecutive months.

7. Paragraph 3 of the LOA93 is replaced with "3. In all liquid radioactive waste disposed from HMNB Clyde, Faslane during any period of 12 consecutive months the activity of the radionuclides listed in Column 1 of the Schedule to this letter shall not exceed the value specified in Column 2 of the Schedule".
8. In addition to Paragraph 8 of the LOA93, MoD shall keep records in respect of General Effluents. These records shall comprise for each of the General Effluents:
 - a. The volume disposed;
 - b. The activity disposed; and
 - c. The disposal route
9. MoD may release Ballast and Trim Water directly from submarines berthed at HMNB Clyde, Faslane.
10. MoD shall inform SEPA without delay if they have 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 LOA93 and this addendum, and shall report the circumstances in writing to SEPA as soon as practicable thereafter.
11. MoD shall provide SEPA with any other information that SEPA may reasonably require to determine compliance with, or review of, the LOA93.

Yours sincerely



Dr Paul Dale

Cc David Langbridge, Defence Safety Authority, Poplar-1. MoD Abbeywood South Bristol, BS34 8JH