

SMALL USERS LIAISON GROUP

NOTES OF THE SIXTEENTH MEETING HELD AT STEEL HOUSE, LONDON ON MONDAY 2nd JULY 2001.

1 Present

Dr J McHugh, Chairman	Environment Agency, RSR Head Office
Dr R Allott	Environment Agency, NCAS
Dr G Davies	BNMS
Mr M Ramsay	SRP, (for Ms M Minski)
Mr R Larmour	Environment and Heritage Service (Northern Ireland)
Mr N Heptinstall	Environment Agency, Wales
Ms E M Pitcher	IPEM, Bristol General Hospital.
Ms H May	DEFRA Radioactive Substances Division, (for Mrs F Shand)
Mrs W Bines	Health & Safety Executive
Mrs C Griffiths	SRP; Sheffield Health Authority
Dr G Zabierek	AURPO; University of Birmingham, (for Mr Moseley)
Mr A R Richards	AURPO; University Hospital of Wales
Mr I Fife	IPEM; Royal Free Hospital, London
Dr D J Morecombe	PIRSDG; GlaxoSmithKline
Dr C E McDonnell	National Radiological Protection Board
Mr D J Walland	IRP; University of Bristol
Mr M G Leach, (Secretary)	Environment Agency, Anglian Region

2 Introductions, and apologies for absence

Dr McHugh welcomed members to the sixteenth meeting of the group. Apologies had been received from:

Dr C R Williams	Environment Agency, RSR Head Office
Mr S Yardley	Environment Agency, Anglian Region
Dr C Weedon	Environment Agency, Northwest Region
Dr P Heaton	Environment Agency, Thames Region
Dr J Lewis	Environment Agency, Midland Region
Ms M Minski	SRP
Mr T Moseley	AURPO

3 Minutes of the fifteenth meeting, held on 7 December 2000.

The following corrections were agreed:

Page 3 – section 6 – Re Trevor Moseley, change Mrs to Mr.

Page 3 – section 5 – Action 15.2 should be Action 15.5. All subsequent actions would be renumbered accordingly.

Page 3 – section 6 – change “Exception” to “Exemption”.

Page 5 – 2nd paragraph – add ‘of’ between “regulation” and “radioactivity”. Change SI3 to s13. It was noted that Alan Trevelyan in the Agency’s SW region was the source of the advice on HWID and the disposal of organic scintillant.

With these changes, the minutes were accepted as a true record of the meeting.

4 Actions from the previous meeting and matters arising not on Agenda.
(Numbers refer to corrected numbering, not that given in the previous version).

15.1 Completed

15.2 Mr Walland's request for written agreement from the EA to circulate more widely his Word version of the RSA93 application form had been forwarded to the appropriate part of the Agency for a response. This was still awaited.

Mr Leach updated the group on an Agency pilot project to make available certain application forms that could be received, completed and returned electronically. Dr Weedon had arranged for RSA 1 open and RSA 3 forms to be part of this trial.

Mr Walland suggested that it was difficult to find certain documents on the EA Internet site and that it could help with the electronic application form trial if this aspect was addressed. Mr Leach agreed to raise the matter within the EA.

Action 16.0 Mr Leach

15.3 Mr Heptinstall updated the meeting on the EA project regarding the storage and disposal of radioactive waste. He would report progress to the group as required.

Action 16.1 Mr Heptinstall.

15.4 Completed. Dr McDonnell still felt that there were problems that needed to be addressed. The most significant of these was the need to differentiate between charges raised because of an operator application, and those raised because the Agency had requested a review of the certificate conditions.

Dr McHugh then appraised the group of a legislative review that was underway by DEFRA and EA. The Agency had indicated to its sponsoring Department that there was a pressing need to amend RSA93 in order to allow for transfers of registrations and authorisations from one legal entity to another (such transfers are permissible under IPC and PPC legislation). In the Agency's view this flaw in the primary legislation on radioactive substances needed to be addressed when there was an opportunity to make legislative changes.

15.5 Mr Leach had raised the issue as requested with the Agency's Finance team. Users had been consulted on the proposals for the 2001/2 charging scheme. Dr McHugh pointed out that overall, the Agency's costs for RSA 93 regulation needed to be recovered so that savings in one part of the charging scheme would need to be offset from elsewhere. There had been no major changes made to the final version of the 2001/2 scheme.

15.6 After discussion, it was agreed that this action related to the section in the Field Inspectors' Handbook on handling of incidents involving radioactivity in

scrap metal items. The Agency had disseminated this guidance via the British Metals Federation, and those in the metal recycling industry which were members would have access to it.

15.7 Completed.

15.8 Completed.

15.9 Completed.

15.10 Mr Leach advised the group of that the Agency would be reviewing its Field Inspectors' Handbook for non-nuclear regulation. Some sections would be updated; further sections on a number of topics would be considered. The subject of when an authorisation was required for gaseous discharges had been raised as a possible topic for inclusion. Mr Walland acknowledged that the information which the Agency had obtained from manufacturers had been useful but said that he had been unable to obtain data from the manufacturers regarding activity released when a new pot of radioactive material was first opened. Figures supplied related to steady state discharge only, not instantaneous release. He requested assistance from the group with this problem

Action 16.2 Mr Leach to raise via the Agency's non-nuclear sub group (NNSG).

15.11 Completed.

15.12 Dr McHugh confirmed that the advice on spillage's that had been circulated in the past was that contained in the current Field Inspectors' Handbook. Dr Morecombe felt this advice still left assessment of what constituted a reportable spillage unclear. Mr Leach will raise this with the NNSG.

Action 16.3 NNSG via Mr Leach.

5 Guidance to RSA93

Ms May updated the group on the development of DEFRA guidance to RSA93. Response to the draft had been received from all but the Scottish Small Users Group. Comments had been assessed and DEFRA hoped to publish the guide later in 2001. Ms May asked for comment from the group as to its distribution to users, perhaps via the DEFRA Web site. It was pointed out that not all small users would have access to the Internet. It was felt that as the representatives on the group were acting on behalf of a large number of the holders of radioactive material then they were ideally placed to publicise the existence of the future guidance, when available.

Dr McDonnell said he was concerned about the emphasis in the guidance on 'concentrate and contain' as opposed to 'dilute and disperse'; most disposal routes used by non nuclear users had an element of "dilute and disperse", e.g. discharge to sewers, VLLW disposal. This concern was echoed by others in the group who felt it could have considerable financial implications if implemented. Ms May agreed to take the issue back to the Department who would consider if the text of the guide could be amended.

Action 16.4 Ms May.

Ms May also stated that the statutory guidance relating to radioactive discharges from nuclear sites would be prepared after the summer parliamentary recess. A request was also made for Ms May to provide an update on the position regarding revision of Exemption Orders, to be appended to the minutes.

Action 16.5 Ms May.

Mrs Bines indicated that REPIR were expected to be made in the summer.
[Note, regulations laid on 29th August, to come into force on 20th September.]

6 EA/IPRI/SEPA/NRPB Dose Assessment Policy and Principles

Mr Allott updated the group on the status of the draft document. The consultation draft had been issued last year; approximately 50 responses had been received. Feedback from small users had in general been positive; some pressure groups had considered that the guidance should accommodate more extreme habits and lifestyles.

A response document to the comments was being prepared and would be issued later in the summer. One of the main points raised by responses had been the need for a balance between realistic and cautious assessments. The use of dose per unit release factors during the initial assessment was also being considered.

A further point that had made was the need for more discussions between the Agency and the Food Standards Agency (FSA) to ensure consistent assessment practice. The Agency and FSA had held preliminary discussions about co-sponsoring the final document. Mr Allott was also awaiting the final version of the DEFRA statutory guidance ensure the document on assessment principles was consistent with it. In the interim a preliminary version of the assessment policy and principles would be made available on the Agency web site.

Some members felt that use of a 10 μ Sv dose constraint in the initial assessment, for screening purposes, was rather low when compared to the dose constraint for sources of 300 μ Sv.

Dr Morecambe expressed the view that certain Agency inspectors were not applying BPM principles in that they were requiring reductions in disposals that gave little additional radiological benefits at considerable cost to the operator. Dr McHugh explained that the BSS Directive had driven certain reductions, both by setting lower limits for exposure, and by requiring the use of ALARA. However, he accepted that the DEFRA/DoH draft statutory guidance stated that "*there is widespread international agreement that doses to members of the public of the order of 0.01 milliSieverts per year or less are sufficiently low to be of no regulatory concern.*"

[NB. The Agency's response to this section of the statutory guidance stated "*The Agency considers that discharges need to be properly controlled and minimised using BPM, even if individual doses are below this figure. Dose*

assessments can also change with time, for example as new habits and patterns of behaviour emerge for exposed groups.”]

The existence of a NRPB publication on cost aspects of assessment was mentioned and the meeting suggested the status of this should be clarified.

Action 16.6 Dr McDonnell

It was considered that in future, waste minimisation techniques by small users would be important.

Mrs Griffiths pointed out that more comprehensive assessments were suggesting that unacceptable doses could be received by the public from spreading of sewage sludge on land. Mr Allott felt this problem could be avoided by better modelling and assessment.

7 Inventory of Sources and Releases (ISR) for radioactive discharges

Dr Allott gave a brief history of the Chemicals Release Inventory/Pollution Inventory (now retitled as Inventory of Sources and Releases (ISR)). Holders of IPC authorisations were required to submit an annual return of their discharges and disposals of polluting substances to the Agency. This information was uploaded onto the Agency's Web site via a GIS and it was possible to obtain information on releases via the section of the Web site (What's in my backyard?) Discussions had been held with the nuclear industry about extension of the scheme to their discharges. The nuclear industry had agreed to submit returns voluntarily, starting in 2001 with year 2000 disposals. A discussion document had been prepared, containing the 'lists' of radionuclides proposed for use with the ISR, and threshold levels, above which discharges should be reported annually. These thresholds were based on a fraction of IAEA 'clearance' levels, i.e. discharges that gave rise to a dose of $<1\mu\text{Sv}$ for an individual radionuclide. Total alpha and total beta would also be reported. The reporting form and guidance for the nuclear industry was tabled. This will be sent to members of the Group.

Action 16.7 Mr Leach

Mr Allott indicated that there was interest in the EU and in OSPAR for consistent reporting of radioactive discharges; the ISR would assist the UK in meeting its obligations and in applying pressure to other countries to do so. In discussion the following points were raised:

- a Guidance on partition co-efficients between liquid and aerial discharges may be required to ensure appropriate splits between the disposal routes.
- b would discharges from sites operating under Exemption Orders, e.g. the Hospitals' EO, which did not have authorisations, need to submit data?
- c Should decay calculations be made to ensure more accurate discharge figures are obtained?

- d A new reporting form may not be needed if most users already reported disposals as a requirement of their RSA93 authorisations.
- e for some users, the ability to make electronic returns would facilitate data gathering and submission?

It was agreed that it would be helpful if a small number of SULG members were to interact with Dr Allott to discuss these points, and a meeting might be held when appropriate. Dr Allott would arrange for the points to be considered and for a meeting to be arranged.

Action 16.8 Dr Allott

8 Disposal of patient clinical waste and incontinence pads

A query had been raised by a hospital RPA regarding practice to be followed for disposal of incontinence pads from patients and patients who had been treated with radioactive materials. The RPA had indicated this was of national concern and therefore Dr McHugh had sought SULG views.

Disposal of this material, in particular that containing I131, had led to ash from clinical waste incinerators failing the VLLW criteria for disposal. Mrs Griffiths outlined the practice followed by hospitals for whom she was RPA that she recommended to the group. In some circumstances, this involved local collection of waste from patient's homes by hospital staff. The group were invited to consider whether this should form the basis of national guidance, perhaps for the Agency's Field Officer's Handbook. Some members felt that the arrangements in Sheffield described by Mrs Griffiths could not be implemented easily in their regions. IPEM would raise the matter with its special interest group of IPEM and report back to the SULG on the national situation.

Action 16.9 IPEM representatives.

9 EA re-organisation

Dr McHugh informed the group of the existence of an Agency project, acronym BRITE (Better Regulation Improving The Environment). As part of BRITE, improvements in the way delivery of RSR regulation were being considered. Developments were at an early stage, however in the future national process management groups could be set up to ensure greater consistency in regulation, provide technical guidance, process handbooks etc. For radioactive substances there might be two process managers for the radioactive substances group, one nuclear, one non-nuclear, with appropriate technical specialists and support staff. Further information would be advised to the SULG as the project developed.

10 Any Other Business

10.1 Excretion factors

Ms Pitcher suggested that certain excretion factors contained in the Agency's guidance were too cautious and values for some radionuclides could be amended. Dr McHugh pointed out that the Field Inspectors Handbook indicated that changes

to these factors could be already be made if justified by the user. However, IPEM were well informed of the best factors to use. IPEM agreed to consider at their special interest group. If , on a national basis, they felt changes should be made they would make a case to the Agency.

Action 16.10 IPEM.

10.2 National Radium Stock

Mrs Griffiths raised this issue having been alerted by a user who had some radium sources originally supplied as part of the "National Radium Stock". Dr McHugh detailed the history relating to the National Radium Stock, in that post-war much UK radium was leased from the predecessors of Amersham, being returned there when no longer required. Items in this category were usually labelled as being part of the National Stock. During the privatisation of Amersham, the responsibility for control of this material had become unclear. Users who still had labelled stock which they now wished to return were experiencing problems in finding organisations which would acknowledge 'ownership' of the stock and had requested advice. The Agency had contacted Amersham who had advised that the person who had raised the query (via Mrs Griffiths) should write to the company to raise the matter formally. A contact at Amersham was made available. Mr Walland stated that he had a copy of a letter (dated 1987) which may clarify the position on the National Radium Stock. He would forward a copy to the SULG for circulation.

Action 16.11 Mr Walland.

10.3 Advice to Schools

A request for assistance from the Agency in preparation of a leaflet to be distributed to schools was made. This leaflet would provide advice regarding the disposal of radioactive material in a safe and economic manner. Mrs Bines stated that it was unlikely that the Department of Education would be revising its guidance in the foreseeable future. She therefore supported the production of such a leaflet. Dr McHugh felt that in principle the Agency would be willing to assist.

11 Next Meeting

The next meeting will be held on Wednesday December 5th 2001 at DEFRA, Ashdown House, 123 Victoria Street, London, 10.30 am start.

Addition to the minutes.

As per Action 16.5 the update of the position re Exemption Orders is: -

For most of the period concerned progress has been stalled.

Specific guidance has been received from Ministers who are keen to create a new Natural Gas EO to cover the position where radon in natural gas is at levels which technically require pipelines and facilities to be registered under RSA93. A consultation exercise is due shortly.

With respect to the other EO's, officials are formulating plans to take forward the stalled review.