

## SMALL USERS LIAISON GROUP

### NOTES OF THE TWENTY-FIRST MEETING

HELD AT DEFRA, Rimnet Suite, ASHDOWN HOUSE, LONDON ON 11th December 2003

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#### Present

Mr. R Russ (Chairman)	Environment Agency
Mr. B Dare	Welsh Assembly Government
Dr M Sobanski	Cardiff University Safety Services
Dr P Heaton	Environment Agency
Mr. A A John (Secretary)	Environment Agency
Mr. R Harrison	AURPO, John Innes Centre, Norwich
Mrs. C Griffiths	SRP; Sheffield Health Authority
Dr P Marsden	IPEM, UCL Hospitals.
Dr D J Morecombe	PIRSDG; GlaxoSmithkline
Mr. N Higham	Health & Safety Executive
Mr. D J Walland	IRP; University of Bristol
Mrs. L Peake	Environment and Heritage Service (Northern Ireland)
Mr. T J Moseley	AURPO; University of Sheffield
Dr C E McDonnell	National Radiological Protection Board

#### 1 Introductions and apologies for absence

Mr Russ welcomed those present to the twenty-first meeting of the group. Apologies had been received from:

Dr C Englefield	Environment Agency
Mrs. F Shand	DEFRA
Mrs. E M Pitcher	Bristol General Hospital
Mr M Ramsey	SRP, Imperial College, London
Dr G Davies	BNMS
Mr. C Wilson	DEFRA

Dr Englefield was unfortunately unable to attend the meeting as a result of ill health on the day of the meeting. No notice could be given, and hence no one was briefed on the status of Dr Englefield's actions.

Special welcome was extended to Neville Higham, Barry Dare and Mike Sobanski, attending for the first time.

This was Mr Russ's first meeting as SULG chairman, for the benefit of members he explained to the SULG his role in the Agency and detailed his previous professional experience, including 30 years health physics and RPA work with Amersham plc, JET, UKAEA, MoD, NRPB and Bristol Polytechnic.

**SMALL USERS LIAISON GROUP**  
**NOTES OF THE TWENTY-FIRST MEETING**  
HELD AT DEFRA, Rimnet Suite, ASHDOWN HOUSE, LONDON ON 11th December 2003

---

**2 Welsh Representation on SULG**

There was a proposal to set up a Welsh RPA meeting such as the Thames Region RPA meeting. It was noted that other EA Regions were being encouraged to follow a similar route. Mr Barry Dare, WAG and Dr Sobanski, Cardiff University, had accepted the invitation to attend SULG.

**Action 21.0 Mr Russ will invite a member from Welsh RPA meeting to SULG**

Dr Sobanski will report back who will attend future SULG meetings.

**3 Notes of the twentieth meeting held on 11 June 2003**

The following amendments were agreed:

Item 19.7: The second paragraph should be corrected to avoid the repetition appearing in the penultimate sentence.

Item 19.8: The last sentence should read "Mrs. Griffiths stated that the Belfast City Hospital had installed delay tanks."

Because of several other corrections Mr. John agreed to reissue a corrected "notes of the twentieth meeting".

**Action 21.1 Mr. John**

Most of the SULG were unhappy at how long it took for the draft of the notes from the previous meeting to be distributed. Mr. John apologised.

Mrs. Griffiths requested where possible that the notes from the meetings be available within the subsequent two months, so members can disseminate the information to the bodies they represent on SULG. This was agreed

**Action 21.2 Mr John.**

Dr McDonnell enquired about the status of the FASSET project - A Framework for Environmental Impact Assessment. Mr Russ agreed to obtain a briefing note from Dr Williams to issue to members

**Action 21.3 Mr Russ**

**4 Matters arising**

20.0 No update was available at the meeting, due to Dr Englefield absence, regarding the action relating to a specific RSR WebPage on the Agency's website. Mr Russ agreed to contact Dr Englefield and request a briefing paper, to circulate after the meeting, addressing all the agenda items it will not be possible to cover due to his absence.

**Action 21.4 Mr Russ/ Dr Englefield**

20.1 No update was available at the meeting in respect of the action relating to preparation of guidance for the Lending and Hiring of sources by Instrument Manufacturers.

**Action 21.4 Dr Englefield**

## SMALL USERS LIAISON GROUP

### NOTES OF THE TWENTY-FIRST MEETING

HELD AT DEFRA, Rimnet Suite, ASHDOWN HOUSE, LONDON ON 11th December 2003

---

- 20.2 Mr Russ reported that Dr Englefield and Mr Russ intend to tease out the practical elements from amongst the high level policy in the current draft Guide to the Act (RSA93) to produce a form of Code of Practice (CoP) applicable to small users. Dr McDonnell asked whether this CoP would be of any use. He said why not just update the Non-nuclear Handbook (NNHB), as parts of that document had already been released to users.

Mr. Russ explained that he understood that the RSR Process Group had decided not to maintain the Field Officers Handbook in its current form, it will be replaced, progressively, with work instructions to inspectors and guidance to those who are regulated. [Post meeting note. The future of the NNHB has been the subject of considerable debate, and is still under review]

Mr. Russ outlined the hierarchy of documentation proposed by RSR Process Group:

- ? RSA 93 (and related EOs)
- ? Code of Practice (produced by the EA)
- ? Small-User sector guidance (produced by sector with EA input e.g Medical & Dental Guidance Notes)

It was commented that AURPO have commenced work on a technical guide to RSA93.

Dr Marsden recollected that Dr Englefield had said that extracts from the handbook would be available to SULG. Mrs Griffiths voiced concern that the NNHB is not to be maintained, as it has been of benefit to small users, in providing information on what the Agency perceives as good practice. She asked the Agency to reconsider given that their philosophy is openness and transparency. This was endorsed by other representatives.

The future of the Non-nuclear Handbook is to be reviewed in the light of these concerns.

**Action 21.5 Dr. Englefield**

Dr Marsden will table the issue of sector guidance, at IPEM.

**Action 21.6 Dr Marsden**

- 20.3 Action completed.

- 20.4 No update was available at the meeting regarding the action on the production of electronic application forms for RSA93.

**Action covered by 21.4 Dr Englefield**

- 20.5 Action completed.

## SMALL USERS LIAISON GROUP

### NOTES OF THE TWENTY-FIRST MEETING

HELD AT DEFRA, Rimnet Suite, ASHDOWN HOUSE, LONDON ON 11th December 2003

---

- 20.6 Dr Morecombe said that there had been a lot of discussion at the Thames RPA Meeting on BPM, and that he had attended a further meeting on BPM convened by Peter Brember. He queried whether the comments at that meeting had been incorporated into the latest Agency BPM guidance and the SNIFFER project.

At the last meeting, it had been agreed that the latest draft of the BPM document would be distributed electronically after the meeting but this had not been completed.

The current version of the BPM guidance is to be distributed, and Dr Morecombe's question addressed

**Covered by Action 21.4 Dr Englefield**

- 20.7 No update was available regarding the action to amend the BPM guidance in the light of the output from SNIFFER.

**Covered by Action 21.4 Dr Englefield**

- 20.8 Dr Marsden chairs the working group on iodine delay tanks. He had nothing to report to SULG as yet.

**Action 21.7 Dr Marsden**

- 20.9 Action completed

- 20.10 The Agency has raised with Defra the current difficulties with regard to disposal of radium. The Agency has convened a major meeting in London in early January to review the way forward in respect of radium and the disposal of disused sealed sources ('amnesty'). Mr. Russ requested information on disused high activity sources that SULG members may be aware of, that cannot be disposed of due to financial difficulties. The Agency has offered to project manage the collection of these disused sources should funding be available.

**Action 21.8 SULG**

Dr Marsden informed the meeting that he had been approached by certain schools to assist with their source disposal. He had discussed with his EA inspector the possibility of collecting together these sources from a number of schools and disposing of them all together via Safeguard International Ltd. Although his local inspector was willing to issue the relevant variation, Safeguard had pointed out that this would be in breach of the EO.

Update on Safeguard

It was thought that Safeguard had suffered from the loss of experienced staff, especially for dealing with high activity sources. There is a backlog on the collection of type A and B sources. Barry Moloney would like to discuss the situation with interested parties.

Mr. Russ to invite Mr. Moloney to the next meeting

**Action 21.9 Mr. Russ**

## SMALL USERS LIAISON GROUP

### NOTES OF THE TWENTY-FIRST MEETING

HELD AT DEFRA, Rimnet Suite, ASHDOWN HOUSE, LONDON ON 11th December 2003

---

Dr Marsden asked about whether there is a problem, nationally, with regard to source collection. This issue has been raised by Mr. Russ with Defra; it reflects the fragile nature of the source disposal infrastructure in the UK. The Agency has previously advocated the establishment of a form of national disposal service.

#### **Action 21.10 SULG to lobby Defra (Chris DeGrouchy)**

- 20.11 A paper on recording of accumulated waste for longer-lived radionuclides had been circulated by Mrs. Griffiths. This also appears as item 8 on the agenda but it was agreed to deal with it under Matters Arising, as it is an action from the previous meeting.

It was noted that the approach outlined hadn't been formally adopted by IPEM, however, it is hoped that the proposal will be endorsed once comments have been received from the Agency and SULG and the paper amended as necessary. SULG members were asked to send comments to Mrs Griffiths, who would amend the paper prior to issue to Dr Englefield.

#### **Action 21.11 SULG members**

Mr. Moseley asked about the project on decay storage and the connection with Mrs. Griffiths' paper. Mrs Griffiths was unaware that there was any connection but Mr Russ agreed to find out about the outcome of the project

#### **Action 21.12 Mr. Russ**

- 20.12 Mr. Russ had contacted High Tech Sources Ltd about transfrontier shipment requirements and Co<sup>57</sup> flood sources. He suggested that HTSL apply for a TFS authorisation, which would allow multiple shipments. He has also written to the Head of the RP function in the EU with a proposed change to the wording of the TFS Rad Waste Directive (92/3)

Mr. Russ reiterated that any organisation could apply to the Agency for a TFS authorisation. There is no cost associated in obtaining the certificate, it can cover multiple shipments and lasts up to three years. It can, however, take several months to obtain the certificate.

- 20.13 No update was available at the meeting regarding the action of reviewing the invoicing procedures. Covered by **Action 21. 4 Dr Englefield**

- 20.14 No update was available at the meeting regarding distributing the detail of the regulatory options under the mobile PET system. Covered by **Action 21.4 Dr Englefield**

- 20.15 The paper on adventitious releases was discussed and endorsed by those present. It was agreed that Dr McDonnell's paper would be taken forward with a request to develop an Agency viewpoint/guidance on adventitious releases.

#### **Action 21.13 Dr Englefield**

**SMALL USERS LIAISON GROUP**  
NOTES OF THE TWENTY-FIRST MEETING  
HELD AT DEFRA, Rimnet Suite, ASHDOWN HOUSE, LONDON ON 11th December 2003

---

**5 Update on RSR policy matters**

Mr. Russ had circulated an RSR Policy update paper to SULG prior to the meeting.

CBRN issues were discussed. Mr. Walland said he would like to see more controls exerted on companies involved in supplying radioactive sources. A meeting was to be held with government shortly, at which the Agency would be represented. Mr. Russ agreed to update SULG on any issues raised.

**Action 21.14 Mr. Russ**

Several members asked whether the "Delivering for the Environment" document was on the Agency's website.

**6 Update from RSR Process, BPM, PI, etc.**

An update on this agenda item is to be included in a post meeting note from Dr Englefield.

**Action 21.15 Dr Englefield**

**7 The Qualified Expert**

There may be a requirement for some existing RPA's to gain competencies on waste management. A summary brief (and forward programme) is required on any new requirements.

**Action 21.16 Dr Englefield**

Mrs. Peake asked how Qualified Experts would be approved. Dr McDonnell was aware that CV's had been sent to the Agency for proposed QEs. Dr Englefield will be asked to keep SULG members informed of how thinking develops in this area of work. Members asked if they could be sent a copy of this paper.

**Action 21.17 Dr Englefield**

**8 Recording of Accumulated Waste**

This paper was taken under 4. Matters Arising (20.11)

**9 Regulatory queries and guidance**

High activity waste and staff exposures from single use plastics:

Mrs Griffiths referred to the approach already documented in the Agency's NNHB for dealing with Technetium-99m waste. What was now sought was a further extension to that methodology, to cover problem high activity waste now arising from single use of Venticis plastics.

Lung Ventilation systems had previously made multiple use of the plastics, but the NHS had now been instructed that these plastics must only be for single use. The outcome is a lot of high activity plastic waste, causing problem exposures for staff in their handling. Careful consideration needs to be given to best practice to ensure staff doses are ALARA. An amendment is to be proposed to the non-nuclear handbook.

**Action 21.18 Mrs Griffiths**

**SMALL USERS LIAISON GROUP**  
NOTES OF THE TWENTY-FIRST MEETING  
HELD AT DEFRA, Rimnet Suite, ASHDOWN HOUSE, LONDON ON 11th December 2003

---

## 10 OSPAR

Mr Russ briefed the meeting on the OSPAR proposals for the reporting of radioactive discharges from non-nuclear industry sectors. He said that non-nuclear discharges had not been reported to OSPAR in the past, and there are currently two recommendations to OSPAR's Radioactive Substances Committee, for the collection of data:

### (a) Oil and gas industry

In conjunction with Norway, Denmark and Holland, the UK is developing proposals for reporting of NORM discharges, as it appears that there may be a significant alpha discharge from this sector into the maritime area, but that there has been little monitoring or sampling so far. It is likely that some of the current samples taken by offshore operators may be diverted for determination of radium and lead isotopes.

### (b) Medical sector

The proposal is to use the information collected for the pollution inventory. It was said that EU members should be used to this model as the PPC regime demanded that discharges to the environment be reported annually.

Mrs. Griffiths wondered why Tc<sup>99</sup> needed reporting, as the discharges appeared to be insignificant from the non-nuclear sector. Dr Marsden had been asked to comment on the NNC paper. He had worked out that the Tc<sup>99</sup> contribution was only 0.5MBq .

Mr. Russ said he'd be surprised if the collection of Tc<sup>99</sup> data for OSPAR became an ongoing requirement, if the quantities of Tc<sup>99</sup> proved to be so low.

Mr. Morecombe asked if there was likely to be an impact on the UK Discharge Strategy. Mr. Russ couldn't foresee this, but Defra will be reviewing the UK Discharge Strategy next year.

**Action 21.19 Mr. Russ**

## 11 Any Other Business

### **NORM**

Mrs Griffiths had informed the previous meeting that incinerator operators, without RSA 93 authorisations, had been contacted and requested to burn NORM contaminated sludge. It was unclear if the material had arisen from offshore or on-shore activities

### **Special Waste Regs**

Mr Moseley had raised this query. The scope of the special waste regulations in relation to aqueous discharges of uranium salts appears to conflict with the exemption orders. The Agency was requested to provide written clarification.

**Action 21.20 Mr. John**

### **Justification**

Mr. Russ flagged up the requirement under the BSS Directive for Justification Regulations. There is a Defra timetable starting on 20 Jan 2004. The draft regulations are available.

## **SMALL USERS LIAISON GROUP**

### **NOTES OF THE TWENTY-FIRST MEETING**

HELD AT DEFRA, Rimnet Suite, ASHDOWN HOUSE, LONDON ON 11th December 2003

---

#### **BPM**

Dr Marsden observed that suppliers of radiopharmaceuticals are reducing their ranges but increasing the delivered activities. He wondered whether it would be possible for Agency/SULG to question this practice with the suppliers.

#### **Action 21.21 Agency**

It appeared that the same trend was happening in the Life Sciences area, especially <sup>14</sup>C and <sup>3</sup>H. Mr. Moseley thought this trend was due to the general switching of techniques, which did not require the use of radionuclides.

#### **Source Security**

Dr Marsden informed the meeting that the National Counter Terrorism Security Office thought the Home Office intended to draft legislation on the security of high activity sealed sources. The Agency was aware of the concerns of NaCTSO and the Home Office and is working with them on these matters; the Agency is not aware, at this time, of proposals for legislation beyond that required by the HASS Directive [Post meeting note. The Agency is now aware of the proposals for legislation in this area].

#### **12 Date/venue of next meeting**

It was agreed that the next meeting would take place on 10<sup>th</sup> June 2004. Venue to be finalised.

**A A John**  
**Secretary Small Users Liaison Group**