

**DRAFT**  
**SMALL USERS LIAISON GROUP**  
**NOTES OF THE TWENTY-FOURTH MEETING**  
Held At The Thompson Board Room, Savoy Place, London 6th June 2005

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**Present**

Mr. R Russ (Chairman)	RR	Environment Agency, RSR Policy Manager (International)
Dr. K Mondon	KM	Defra Radioactive Substances Division
Dr C Englefield	CE	Environment Agency, RSR Non-nuclear Process Manager
Dr. G Davies	GD	BNMS; Hull & East Yorkshire NHS Trust
Mr. R Harrison	RH	AURPO; John Innes Centre, Norwich
Mrs. C Griffiths	CG	SRP; Sheffield Health Authority
Mr. I Upshall	IU	BRIMS user group and UK NIREX
Dr P Marsden	PM	IPEM, UCL Hospitals.
Dr D J Morecombe	DM	PIRSDG; Thames Liaison Group; GlaxoSmithkline
Mrs. L Peake	LP	Environment and Heritage Service (Northern Ireland)
Mr. T J Moseley	TM	AURPO; University of Sheffield
Dr C E McDonnell	CM	Health Protection Agency
Mr. A John	AJ	Environment Agency, North East Region
Mr. B Moloney	BM	Safeguard International
Mrs. S Hayward (Secretary)	SH	Environment Agency, Thames Region
Mr. D Slarke	DS	Environment Agency, Surplus Source Disposal Programme Officer

**1 Introductions and apologies for absence**

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

Mrs E M Pitcher	Bristol General Hospital
Mr. C Wilson	DEFRA Radioactive Substances Division
Mr. N Higham	Health & Safety Executive
Dr M Sobanski	Cardiff University Safety Services
Mr. M Ramsey	SRP, Imperial College, London

**2 Minutes of the twenty-third meeting, held on 9th December 2004**

CM asked that action 23.14 should be deleted as he was only raising awareness within the EA.

**Action 24.0 SH**

**3 Matters arising**

The EA sent an Actions Update paper to the members, prior to the meeting, detailing the status and progress on actions from SULG 23. This section deals only with those actions discussed further during the meeting.

22.6 Adventitious releases- Guidance from the EA will appear in RASAG on-line guidance on the Environment Agency's web-site soon. It is risk-based and clearly distinguishes trivial from purposeful significant releases.

22.7 **Qualified Experts**

SULG Members explained that there had been some speculation and concern as to which RPAs would qualify for QE status automatically and which would not. Members also requested an update on the progress and status of the consultation, and who had been consulted for their views.

CE clarified the EA's position.

- Informal talks with SRP had taken place to collect thoughts and ideas only.
- The requirements of the contractor will be agreed with SNIFFER.
- The EA had not drawn up a contract or approached any contractors to run workshops.
- The EA wants to run workshops to engage stakeholders in determining the competencies required by a qualified expert.
- He expects it will take 18-24 months to determine what these competencies are. CE assured the group that the required competencies should not leave extant RPAs in a

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position where they cannot give advice on waste management.

23.3 Disused Sources

The group discussed the disposal provision for radium waste, large vs small sources.

BM summarised the current position. High activity sources are likely to have to go to B.13 at Windscale, but that there are issues at B.13 relating to radon emissions and their permitted discharge. Low activity sources or packages of sources (below 2MBq) may be collected by Safeguard at present. Any questions about volume and specific activity can be referred to Safeguard.

RR explained that the Surplus Source Disposal programme has a project to find a disposal option for large radium sources. (see DS presentation)

PM had no response from the hospitals he contacted regarding large radium sources, he wasn't sure if this lack of response indicated there were no problems in relation to such sources in the NHS.

CG knew of hospitals responding to the questionnaire that have radium sources for disposal and thought there were about 1000 radium sources/items identified in total to the EA that require disposal under the current scheme.

23.5 Increasing activities from suppliers

CG noted that the EA's efforts to influence the suppliers may have produced some improvement. She noted that the hospital main supplier now calls prior to despatch if the requested pack size fails its QC tests and a larger pack size is to be substituted.

23.6 Small User Updates

CM sent his update to SH regarding Testing Instruments EO and VLLW/Landfill Directive.

23.10, Terms of Reference

11&12 It was agreed that RR should inform CLEAPSS that SULG have agreed that they should nominate a representative - it is understood that CLEAPSS intend to nominate Ralph Whitcher.

**Action 24.1 RR**

RR- Draft Terms of reference were circulated to the group and comments sought within 4 weeks.

**Action 24.2 All**

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**4 Update on HASS Directive and Security**

CE gave an update presentation on HASS and the impending new regulatory regime for the security of radioactive sources. He emphasised that Defra have not yet finalised the draft regulations and consequently some of the details in the presentation may be subject to change. He explained that the presentation was the Agency's view of how the regulations might be implemented based on the consultation document. The presentation is not to be made more widely available for distribution because of the likelihood of change. Some key elements include:

- Implementation of the Regulations expected during September this year.
- Tritium (GTLD) and Iridium192 wires will not be included.
- Source transfers will be classified as movements to and from suppliers, users and waste contractors.
- Transfers under HASS will not include daily movements of the source to and from the normal storage area.
- Information on the source will include a photograph, which must show what the source looks like (it does not have to be of the actual source supplied).
- Existing RSA application forms will be adapted to include sections for HASS.
- There will be prior inspection by an EA officer before the application can be granted.
- For an existing registered premises, a new HASS certificate will replace the old one when the site wishes to buy a new HAS source.
- EA Guidance for applicant may be consolidated in the Defra guidance notes.
- EA IT systems will match transfer data (sender and recipient) within 14 days. There are practical implications to this type of tracking system, which the EA are still working on.

Security

The scope of the proposed security regime is wider than that for HAS sources, i.e. more sources will be caught by security regime than HASS. It will be a risk-based approach based on the use of the source as well as the radionuclide and activity.

NSAC are going to re-issue the ACPO guidance with improvements.

Registration applications within the scope of the security regime will be assessed by a CTSA (Counter Terrorism Security Adviser) as well as by the EA. If the CTSA is not satisfied with the security arrangements/application the permit will not be granted. The EA will deem the application refused. The applicant will have to address the deficiencies found and reapply.

RH asked if this meant dual policing for HAS sources? CE responded that this would be the case, although the EA officer would try and do their pre-registration checks with the CTSA.

RH asked if the police had improved their awareness of radiological impacts and if they had received training? CE replied that officers had received some radiological training. He expected both the Police and the EA to exchange knowledge and experience as implementation progresses.

CG commented that the officers she has met with so far have not been as informed about radioactivity as hoped; a proposal by the officer to randomise Technetium-99<sup>m</sup> isotope distribution times was not practicable given the short half-life of Nuclear Medicine isotopes and the patient administration schedules.

CE explained that existing registered sites may require a programme of improvements to bring them up to standard for security measures. These improvements would be to an agreed time schedule. They will be listed in the registration certificate (this is similar to the improvements listing in Pollution Prevention Control certificates).

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New sites must be up to the required standard or their application will be refused, returned and a refund given. Security plans are not expected to be part of the application, the EA will inspect them at the premises.

Lost sources must be reported immediately with a photograph of the lost source. The EA will cascade this photo to the other relevant Agencies.

CM asked how financial provision will be calculated for disposals in the future? RR responded that Defra are leading in this area supported by the EA. Defra's consultants, Deloittes, were reluctant to speculate on disposal costs over such long periods (> 10 years), and therefore were reluctant to specify levels of provision.

CM asked what would happen if the operator could not specify the financial provision or mechanism for disposal due to this uncertainty? Would the EA grant the permit? CE responded that if the operator did not have any financial provision the application would be refused. The EA would only perform initial checks rather than inspect credit history.

RR commented that the EA would not hold money for financial provision of disposal costs, other mechanisms are being considered, and we need to see what Defra's guidance includes. Source suppliers have been fully engaged in the consultation.

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**5 Small User Items**

**5(i)** CoWRM Stakeholder Dialogue

CG presented the group at the first Stakeholder Forum in January 2005, and prior to this meeting, SULG members had been circulated with an e mail and requested to review the consultation documents provided for the 2<sup>nd</sup> CoWRM Stakeholder Forum, available on the internet, prior to her attending the second forum to represent SULG views over the next two days. She had raised all the points sent to her from small users at the first forum. These points appear in the minutes of the first Stakeholder Forum, available on the CoRWM web site. The group was asked to give their thoughts on the questions raised on page 39 of the consultation document.

She informed the group that CoRWM has no remit for small user wastes (wastes produced from medical, education and industrial sectors). Most wastes discussed at the CoRWM Stakeholder meeting were ILW and HLW from the nuclear industry (including legacy wastes), although problem nuclear industry produced LLW unsuitable for Drigg disposal was subject to CoRWM consideration. Incineration of LLW and VLLW wastes is the subject of a separate policy review.

She explained that the agenda of the Stakeholder Forum is rigorously controlled and there would be little opportunity to discuss matters other than in relation to the specific areas stated in the CoRWM consultation document.

The group discussed:

- A) the different waste disposal needs of the small users as opposed to those of the nuclear industry and
- B) their views on waste disposal strategy and acceptable risks and the burdens on future generations.

(A) The consensus was that small user waste needs separate consideration for disposal to nuclear waste because of ;

- Cost (deep burial more expensive and over engineered for small user wastes and may deter use of sources by small users),
- Availability of access of the route to small users (Public perception of nuclear waste vs medical/research etc wastes
- Shorter half lives.
- of nuclear waste vs medical/research etc wastes
- Shorter half lives.

RR commented that the public relations side of small user waste needed careful presentation to CoWRM.

KM suggested they could have different disposal options for different categories of waste, depending on half-life and activity

TM suggested local waste solutions for locally produced waste to reduce transportation.

**5(ii)** (B) The consensus was;

- Any risk assessments that are used should be scientifically derived.
- A 'no risk to public' approach was not appropriate.
- Future generations get less exposure from action now.
- Costs should not be passed to future generation, but in practice this is what might happen.
- A risk level of 10microsieverts might be an upper-bound from a scientific basis.
- A risk level of 1microsievert might be acceptable, from a public viewpoint, but would incur extra costs. Who would pay, the taxpayer or the polluter?

Landfill Directive, VLLW update.

RH said that most of his questions had now been answered by the Policy Update paper. He did have concerns over the possible loss of the landfill disposal route, he explained that his sector is dependent on this route and that they would keen to see it remain as a disposal route.

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**5(iii)** Clarification of BPM Statement with respect to public access.

DM raised this issue as some sites have been told to disclose their internal audit findings and their improvement plan as part of the BPM documentation. Not all sites may be happy that this information enters the public domain (BPM Statements are part of an application under RSA1993 and as such would normally go onto the public register).

RH said that this could deter operators from admitting non-compliances in audit reports. CE said there may be a case to claim commercial confidentiality for these sections with the local inspector. AJ commented that internal audits from operators do not routinely go onto the public register.

SH suggested that such audit reports could be a separate document from the BPM statement. CE added that the EA would have to release such information, if it was held by the EA, in response to a Freedom of Information Act request, unless the request failed the tests for release. CE will check what the legal position is, on what can or can not be released. He agreed this was a key issue and guidance will be published in RASAG.

**Action 24.3 CE**

**5(iv)** Use of Pollution Inventory Data.

DM raised a concern over Pollution Inventory data being used by inspectors for compliance checking. His understanding was that this was not the purpose of the PI and that checks on compliance are made by the inspection system.

SH said that the PI had replaced the Annual Release Inventory, which was routinely used for compliance checking, and that EA inspectors do check PI submissions against limits as part of the QA process on the PI. AJ added the PI indicated where an inspection may be needed to check records against the authorised limits.

CE commented that he needed to check what the EA meant by 'Pollution Inventory purposes'. This phrase was used on the covering letter, which went out with the specification to all authorised sites not already on the new template.

**Action 24.4 CE**

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**6 LLW Policy Review Consultation**

KM explained that the Government and Devolved Administrations were preparing to issue a consultation paper on LLW policy. The resultant new policy would update Cm2919, and its aim was not to address the detail of the individual LLW management decisions that have to be made, but rather to define the high level framework - requirements and principles -within which such decisions must be made.

The programme for this work was as follows: -

A first stakeholder workshop (held in April 05) to identify main issues and suggestions for solutions – (draft consultation paper based on the outputs is underway) –

A draft consultation paper will form the basis of a 2nd Autumn workshop (6<sup>th</sup> Oct 05) for the same stakeholders. - Its outputs will be used to finalise the consultation document for Ministerial approval, (issued around the turn of the year)

The aim is to complete the consultation around March/April and issue a new policy statement in May/June 2006. Small users' representatives have been invited to the workshops – these being Mike Borwell (UKOOA), Jeff Kersey (CIRIA), Peter Marsden (UCL Hospitals), Colin Martin (NHS Glasgow) and Cathy Griffiths (consultant).

Background papers for the first workshop (including 2 on small user issues), and subsequent papers associated with this process, are, and will be, placed on a website:

[www.peoplescienceandpolicy.com/llw/index.html](http://www.peoplescienceandpolicy.com/llw/index.html).

KM invited SULG to provide any additional comments on the problems faced by their sectors to Defra, as well as offering ideas/solutions. She would inform RR when the report of the 1st Manchester workshop was available, and SULG could use this as a basis for providing any further thoughts.

The draft consultation paper would also appear on the website in the early autumn. SULG could also provide comments on that document. KM also invited SULG to consider if they would prefer to avoid the term "small user" in official documentation (and if so, what it should be replaced with). Apart from being a misnomer in some cases, some attendees at the Manchester workshop were concerned that it rather implied that non-nuclear sector wastes would not get sufficient attention.

RR suggested 'non-nuclear'. CE said there might be a lack of understanding, as public do not differentiate between 'radioactive' and 'nuclear'.

The group discussed a range of topics:

- proximity principle i.e. whether waste disposal should be local to waste producers to reduce transport impacts
- a possible reduction in availability of landfill, controlled burial and incineration if a large mixed waste site was built
- Local Authority facilities
- public opposition to local sites
- the need to education on the benefits of radioactive products to society
- separate disposal solutions for non-nuclear and nuclear wastes

KM sought views on whether incineration of low level waste from nuclear sites at commercial incinerators would help the commercial viability of the companies operating those incinerators and was it appropriate for such incinerators to be local to the place of origin of the waste?

RR asked PM to be SULG representative to Defra on this consultation process. PM Agreed.

PM briefed the meeting on the workshop he attended.

He mentioned that there were only 2 or 3 small users at the workshop, but they were able to get the workshop to recognise the need for non-nuclear waste routes. There is a need to preserve existing routes not just build a new one. This is essential if important sectors e.g. medical are to continue to use

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radioactive products for therapy/diagnostics. The medical sector is increasing their use of radioactivity and consequently some waste streams are increasing - these increases can be justified because of the societal benefits.

RR emphasised that we need a more strategic approach to waste management. The current infrastructure seems to be rather 'fragile' - we need continuity and a preservation of routes.

KM agreed that Small Users have an ongoing need for a waste disposal route unlike the Nuclear Industry, which has mostly legacy waste. KM agreed to send RR the draft consultation paper on LLW Policy review by e-mail.

**Action 24.5KM**

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**7 Surplus Source Disposal Programme (SSDP)**

Duncan Clarke gave an update on the Surplus Source Disposal Programme. His presentation will be sent to SULG members.

**Action 24.6 SH**

The SSDP Project Team is about to issue successful subsidy notifications to applicants - refusals have already been sent.

Just under 6000 eligible sources have been identified. Subsidies for the removal of 200 sources, 4 of which have been irradiators or teletherapy, have already been granted. Work has now been completed to categorise the sources according to potential hazard using the International Atomic Energy Authority (IAEA) Categorisation (1-5). The breakdown by category is:

Cat 1	9
Cat 2	22
Cat 3	14
Cat 4	422
Cat 5	5384 (includes 840 where insufficient information provided to categorise properly)

Approaching 50 TBq has already been dealt with, the majority for recycling. Approximately £250k has been spent so far.

Subsidies

- Subsidies will be based on the IAEA method of characterising radioactive sources.
- Universities, hospitals and public bodies will receive 50% subsidy for the disposal of category 1-4 sources, and 20% subsidy for the disposal of category 5 sources.
- Industrial/commercial source holders (including metals recycling facilities) will only receive subsidies in exceptional circumstances, such as holding orphaned sources.
- Consideration will be given to funding expert advice on disposal options in schools. Colleges to receive 50% subsidy for disposals.
- Registered museums will receive 50% subsidy for disposals.
- A radium assessment programme is to be completed by end July 2005 with a view to a distinct subsidy programme being launched

Information on all declared sources has been passed to CTSA's. Information on non-eligible sources will be passed to local inspectors.

CG said some operators did not reply because they knew they were unlikely to get subsidy. They feared their information would be used by the local inspector to pressurise them to dispose of their source(s).

Radium is the most common declared radionuclide, and presents a challenge for disposal. The SSDP has accepted the task of finding disposal options by end of July 2005.

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Disposal Options

- Reuse/recycle
- Intermediate level waste: - consign to MBGWS, Sellafield (via Windscale B13) or other authorised route.
- Low level waste: Drigg or other authorised route, including incineration where appropriate.

CG asked if small sources could be sent by post for incineration?

CE stated the EA does not advise on transport matters and referred her to the Royal Mail website and RMTD within DfT.

Eligible sites need to get quotes from contractors and spend their subsidy by the end of this financial year i.e. 31<sup>st</sup> March 2006. BM said sites need to get requests for quote in as soon as possible to avoid the rush for quotes at the end of the financial year.

TM remarked that given the short time scale for quotation and expenditure, could the questionnaire form have asked sites to get quotes at that time? DS replied that without the scale of response it was hard to decide the scale and direction of the programme.

RH queried why his site had been refused subsidy when they were a grant funded, non-profit research establishment? DS replied that RH needed to appeal the refusal and could contact him

There was a discussion on the risk based approach used by the programme since much of the Am-241 marked as eligible are smoke detectors from qualifying sectors.

CM reported that he and other consultant RPAs within HPA were disappointed at the decision to make the industrial sector ineligible for subsidy at the outset. He suggested that there could be some sources in this sector that might represent a higher risk than some other sources that will be collected within the programme. (This could include some part-decayed cobalt-60 radiography sources and some GBq level americium gauging sources). He felt that the "no subsidy" warning was a disincentive for organisations in this sector to report their sources, and this may have reduced the value of the survey.

DS responded that the decision on eligible sectors was made by the Government/Regulators Steering Group, and took into account EU competition and State Funding factors (industrial sites receiving subsidy would be at a competitive advantage relative to those who had already disposed of their sources).

RR commented that businesses have a responsibility to make financial provision for disposal of their sources. The programme was concerned with reducing the risk from terrorism and eliminating the legacy disused sources.

CG asked if the Steering Group could reconsider, using the risk based approach, as industrial radiography sources are known to trigger NAIR incidents. CE commented that existing HASS qualifying sources must have financial provision in place by Jan 2008.

CM asked about those who had missed the SSDP submission deadline. DS said that the programme team had chased non-responding site by letter and telephone.

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**8 RSR Website and RASAG update.**

Bob Russ updated the meeting on the major review the Agency has done on its radioactive industry sectors web pages. The current "Nuclear and other radioactive substances" business sector website has been split into two business sectors: "Radioactive substances users" (non-nuclear); and "Nuclear Industry. Each sectors home-page has a link to the other sector's home-page. The new sectors can be accessed by using these links:

<http://www.environment-agency.gov.uk/radioactive>

and

<http://www.environment-agency.gov.uk/nuclear>

The Radioactive Substances Users site has a dedicated page for SULG. The organisations represented are listed but names are not given. Names can be found on the minutes, which are posted in this section.

Any feedback on the new web pages should go to Bob Russ.

CG suggested the Actions Update could be published on the SULG page. CE asked that if this was agreed the Actions Update should also go onto the EA intranet for inspectors to read. After discussion an initial view was reached that this paper would not be posted on the SULG page, this could be reviewed at the next meeting. The meeting agreed that the Policy Update paper could be posted on the SULG page.

**Action 24.7 RR**

**9 Update on RSR Policy matters and Drigg review**

The EA Policy Update paper had been sent to the members prior to the meeting. RR asked if further expansion or discussion was required - no further discussion arose.

RR briefed the meeting on the forthcoming consultation on the new Drigg authorisation, which will start on the 15<sup>th</sup> June. Ian Streatfield is the Agency's Nuclear Regulator for the site and his consultation document can be viewed through this link:

<http://www.environment-agency.gov.uk/yourenv/consultations/1098774/>

The EA are keen to receive the views of small users as they are significant stakeholders.

**10 AOB**

**(i) Changes in legal entity and impact on related authorisations.**

DM enquired whether, if there is a change in legal entity at a commercial incinerator, this will affect all the authorisations which refer to that incinerator, in particular whether all users will need a variation to their certificate, and if so will there be a charge? SH explained Agency practice over simple company name changes, when incinerators have a change of name only the EA does not normally do a widespread variation of certificates. Rather as the certificates are varied for other reasons the name change is dealt with at that time.

CE advised that the certificate specifies the premises as well as the company name, therefore he thought no variation was required if the premises remain the same, but agreed to check this aspect.

**Action 24.8 CE**

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(ii) Shared radioactive waste stores.

DM asked if the EA approved of shared radioactive waste stores, and if so what paperwork/procedures etc need to be in place if 2 or more legal entities share a store? CE pointed out that RASAG addresses this circumstance in the EA web-site.

<http://www.environment-agency.gov.uk/business/444304/945840/1064273/?version=1&lang=e>  
(Ch4 section3 Multiple Occupancy sites)

(iii) Iodine-131 therapy patients discharged and readmitted elsewhere with higher than normal I-131.

DM asked, what would be the EA response to the following scenario?

A Nuclear Medicine Dept did a risk assessment and decided to discharge a thyroid patient with more than the usual amount of retained I-131 (about twice as much). The reason the patient was discharged early was that he was getting very stressed out about being in what he felt was an isolated and claustrophobic environment and Nuclear Medicine made the decision, in conjunction with their RPS that this was justified. This was in accordance with the Medical and Dental Guidance notes if it was felt necessary on clinical grounds and a risk assessment was performed and an instruction card was issued to the patient along the national guidelines. When patients leave the hospital I think it has been established that the RSA93 no longer applies to them - this is the case with I-125 seeds with Prostate Brachytherapy patients. Of course one would still expect that the employer should take reasonable care. The patient then became ill and was admitted to another hospital.

The patient was originally discharged in good faith with no reason to believe he would be readmitted. Has this hospital trust contravened RSA93?

CE responded that the receiving hospital could use the Hospitals EO if appropriate. If the hospital was authorised the discharges should be managed within the limits of their authorisation. If the discharges place them in breach of their limit and the isotope is long-lived, they must seek a variation to the certificate as soon as possible and the local EA office should process the application with haste. Breaches caused by short-lived radionuclides in this situation can be disregarded. He expected the local Agency regulator to take a light regulatory approach. The discharging hospital should have no liability if they followed established procedures (eg MDG notes).

- (iv) SH announced her resignation from the EA and the role of SULG secretary. She thanked the group for the opportunity of being their secretary.  
RR thanked her for her splendid contribution to SULG.

**11 Date/venue of next meeting**

Next meeting will be 29<sup>th</sup> November 2005. Venue = Savoy Place.

**S Hayward**  
**Secretary Small Users Liaison Group**