

## **News from the SULG Small Users Liaison Group**

The 26<sup>th</sup> meeting of the SULG was held on 7<sup>th</sup> June 2006.

The following matters were discussed:

### **Regulation of trivial releases to air:**

The Environment Agency is reviewing its regulation of trivial releases of gaseous and aerosol radionuclides with the objective of providing regulation which from the point of view of user and regulator is proportionate to the actual risk.

### **Low Level Waste Policy Consultation:**

Defra received over 100 responses to the May 2006 LLW consultation.

In support of the suggestion that Government policy should require regional and local planning authorities to consider non – nuclear disposal needs, Defra intend to gather information on the quantities of waste generated by the non-nuclear sector. A sub group of SULG will be set up to assist Defra with this task.

Defra hope to publish the final policy in early autumn following ministerial and parliamentary review.

### **Exemption order review:**

A revised Testing Instrument Exemption Order will be issued in October. The revised order will update the definition of a waste collection authority, clarify that damaged or defective sources are not exempt from registration and will exempt from registration mobile radioactive apparatus that consists of a testing instrument or contains an electrodeposited Ni-63 source. This order will resolve issues concerning mobile chemical agent monitors used by the emergency services.

Despite clear recognition of both users and regulators that a full review of the existing EOs is needed, no substantial work will be undertaken on this task in this financial year. Work in this financial year may include development of a programme for change and liaison with users, possibly by means of a ‘work-shop’.

### **Environmental Permitting Programme:**

Work is being undertaken by Defra, the Welsh Assembly Government and the Environment Agency to modernise the permitting system. The programme has initially considered the integration of permitting systems for Pollution Prevention Control (PPC) and waste licensing. Subsequent stages of this programme may include radioactive substance permitting (i.e. registrations and authorisations) although there is no time frame for this and no changes will be made without adequate consultation.

### **DfES regulation of sources in schools:**

A presentation was made to the SULG by the CLEAPSS representative, in which concerns were expressed regarding the proposal by the Department for Education and Skills to revoke Regulation 7 of the Education (Schools and Further and Higher Education) Regulations 1989 (as amended). This proposal will remove a significant degree of regulatory control of the use of sources in schools. It is feared that unless an alternative system of control is imposed, perhaps by review of the Schools Exemption Order, schools will not have the necessary support or

competence to use radiation sources with the result that the teaching of radiation physics will suffer.

The proposal will remove the requirement for schools to notify the local education authority (LEA) if they intend to purchase radioactive materials and will prevent implementation of LEA controls for the purchase, storage and use of sources. The Schools Exemption Order will allow significant activities to be stored and used and it is unlikely without LEA involvement that a school will be aware of the requirement within IRR99 to notify the HSE.

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#### **Very Low Level Waste issues:**

As part of a review of the use of VLLW disposal routes throughout the UK, The Scotland and Northern Ireland Forum for Environmental Research (SNIFFER) is undertaking a research project to review the practice of disposing VLLW with ordinary domestic or trade waste. The project is primarily concerned with non-nuclear sector wastes and is considering the ongoing suitability and operation of VLLW disposal routes within a dose constraint of 20 microSv/year. An issue considered in this review but not in the previous 1995 review concerns the sorting of wastes prior to disposal.

Some preliminary results were related to the group, however, it could not be confirmed that they included VLL secondary wastes generated from the incineration of non-nuclear sector LLW.

#### **EA's Initial Radiological Assessment Methodology:**

Two reports have been issued which are intended to assist the small user to complete environmental assessments. The reports provide some alternative methods to those already usefully described in NRPB/HPA report W63 and its predecessor NRPB M744.

These can be found on the EA website via:

<http://publications.environment-agency.gov.uk/epages/eapublications.storefront/4496badf0192ff14273fc0a8029606dc/Product/View/SCHO0106BKDT&2DE&2DE>

#### **HASS and new RSA application forms:**

The Environment Agency advised that the new interim application forms (RSA1c, RSA2m and RSA3) must be used. If the required change is trivial or minor, the existing practice of notifying changes by letter or email may be acceptable, subject to the agreement of the EA inspector for the site.

To assist timely processing of applications the Agency advised that the HASS interim guidance must be carefully followed. Specific matters were identified in an Agency presentation, which is to be made available to represented societies.

Matters of specific concern included:

- The need to ensure adequate completion of sections of the form relating to justification
- The need for management systems to be in place for HASS and RSA3 applications.
- A BPM document must be supplied with RSA3 applications. Care must be taken to include only material suitable to be placed in the public domain (if in doubt discuss with the EA inspector whether sensitive information needs to be included).
- If a HASS source is disposed of under the Waste Closed Sources EO, notification of the disposal must be made to the Environment Agency.
- All application forms must be sent to the centralised receipts centre in Rotherham. To maintain the security of information, application forms should be sent to the PO Box and words or phrases identifying the contents (eg. RSA93) should not appear on the envelope.

It should be remembered that if you have relatively short half life HASS material owned before HASS was enacted the regulations will apply to you as soon as you bring in a replacement source after 1/1/06.

**Restructuring of Non-nuclear regulation:**

The development of the 7 non-nuclear regulatory teams out of the existing 27 is well under way. Benefits to the regulator and user are expected as a result of the concentration of expertise. It is possible that inspections will be undertaken more frequently mainly due to the implementation of HASS. (Premises with HASS sources will be routinely inspected at least once per year and before HASS registration)

Greater liaison between HSE and EA specialist inspectors is expected.

**Regional RPA groups:**

The group considered the feasibility of setting up regional liaison user groups similar to that operated in the Thames region. Although the existence of such groups was desirable, it was felt that they could only be developed and sustained through the efforts of an individual within each region. It was thought that this matter could eventually be addressed by the 7 area EA offices.

**Transport issues:**

A representative of the Department for Transport advised the group that they use information derived from RSA93 Certificates of Registration and Authorisation to plan inspections of transport operations. When inspections identify non-compliance with the regulations, a common response is to state that an RPA inspection found nothing wrong. He encouraged RPAs to include transport issues in their inspections and if they felt unable to give relevant advice, to advise the employer where such advice could be obtained.

The SRP response to the Defra LLW consultation and DfES Education (Schools and Further and Higher Education) Regulations 1989 consultation are available at: <http://www.srp-uk.org/responses.html>

The next meeting of SULG is to be held on 6<sup>th</sup> December 2006. If you have any issues that you wish to be raised or any queries in relation to the above, please contact Mark Singleton [mark.singleton@sth.nhs.uk](mailto:mark.singleton@sth.nhs.uk) or Mike Dunn [mike.dunn@uhl-tr.nhs.uk](mailto:mike.dunn@uhl-tr.nhs.uk).