RADIOACTIVE WASTE ADVISER APPROVAL BOARD

NOTE OF MEETING

16th November 2023 09:00 to 10:45am

Present: Board Member (SEPA), Secretariat (SEPA), Board Member (EA), Secretariat (EA), Board Member (NRW), Secretariat (NRW), Board Member/Secretariat (NIEA), Note Taker (NIEA), Nuclear Board Members (NILG), Non-Nuclear Board Member (SULG), Non-Nuclear Board Member (SNNILG).

1. Welcome and Introductions.

Board Member/Secretariat (NIEA) chaired and welcomed everyone to the meeting and Secretariat (EA) noted that we were quorate. Nuclear Board Member (NILG) and Secretariat (SEPA) were introduced as new members of the RWA approval board. A representative from NIEA had joined this meeting to take a note of the meeting.

2. Review of Constitution

The board confirmed that they were generally content with the constitution subject to correction of numbering issue with para 11.3. Board members were reminded of the requirements re confidentiality and agreed to abide by them.

3. Minutes of last meeting and actions arising

Minutes of the meeting held in March 2022 had been agreed by correspondence and were confirmed as accurate. Secretariat (NRW) went through the actions from previous meetings:

| Action | Considerate (CCDA) to review the constitution following discussion at the | |
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| | Secretariat (SEPA) to review the constitution following discussion at the | |
| 12.1 | meeting. | Complete. |
| | Published on SEPA website dated 24/09/2021. | |
| Action | Board Member (EA) to prepare an article regarding encouraging | |
| 12.2 | diversity in applicants for RWA approval for discussion at the next board | Action |
| | meeting. | withdrawn |
| Action | Secretariat (SEPA) and Secretariat (EA) to take the review of the RWA | |
| 12.3 | Statement forward and produce draft by Easter 2021. | Action |
| | | withdrawn |
| | | as |
| | | superseded |
| | | by 14.1 |
| Action | Secretariat (EA) to draft a response to SULG and SNNILG (to be sent | , , , , |
| 12.4 | from Chair). | Complete |
| | Initial proposals shared with SULG / SNNILG. | |
| Action | Board members, particularly those from the non-nuclear sector, to | |
| 12.6 | submit comments on how the syllabus may be improved in this area to | |
| | Secretariat (EA) by mid-December. Any options identified should be | Complete |
| | circulated to SULG and SNNILG for comment. | |
| Action | Board Member (NRW) to arrange meeting and speak to Secretariat (EA) | |
| 13.2 | & Secretariat (SEPA) if unable to recruit to secretariat. | Complete |

| _ | Secretariat appointed for NRW. | |
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| Action 14.1 | Secretariat (SEPA) to draft some text by the end of October for circulation to approval board members for their consideration. Secretariat (SEPA) forwarded a revised RWA Statement after the last meeting (email sent 11/3/22) but the revised statement has not been published yet. Secretariat (SEPA) to arrange for publication on website. | Ongoing |
| Action 14.2 | Secretariat (SEPA) to make agreed changes by the end of October and publish the revised constitution on the website. Published on SEPA website dated 24/09/2021. | Complete |
| Action 14.3 | Secretariat (EA) to propose some alternative wording for the proposed syllabus amendment by the end October for discussion and sharing with industry for feedback. Further amendments made and to be discussed during this meeting. | Complete |
| Action 14.4 | Secretariat to review the syllabus for any references to legislation that need to be updated. Discussed during meeting and final amendments to be made. | Complete |
| Action 14.5a | Secretariat to compare and contrast the RPA and RWA syllabi and membership requirements for the professional societies for discussion at the next meeting of the RWA approval board. | Complete |
| Action 14.5b | Secretariat (SEPA) to draft a letter for Board Member (SEPA) to send to HSE, copied to NILG, SULG, SNNILG, RPA 2000 and possibly SDF. | Action withdrawn as superseded by actions agreed during the meeting. |
| Action 14.6 | Review of MPE syllabus to be included with the review of RPA and RWA syllabi. | Complete |
| Action 14.7 | Secretariat (SEPA) to inform the Hunterston B inspector of this decision. | Complete |
| Action 14.8 | RWA Secretariat to consider how to engage with professional bodies over the issue of reciprocal arrangements. | Action withdrawn as superseded by actions agreed during the meeting. |
| Action 14.9 | RWA Approval Board to communicate opinion on CRWA to DRSL and Magnox. | Complete |
| Action 15.0 | Secretariat (EA) to raise the error in section 13c with RPA2000. | Complete |
| Action 15.1 | Secretariat to find a suitable date for the next meeting. | Complete |

| ACTION | Secretariat (EA) to contact RPA2000 to query the length and reason(s) for | |
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| 16.1 | delays in application and renewal processing times. | |
| ACTION | SEPA to publish the agreed, name redacted minutes of meetings on their | |
| 16.2 | webpage going forward. | |
| ACTION | NILG, SULG and SNNILG members to meet and agree a proposed form of | |
| 16.3 | wording that will work for nuclear and non-nuclear users and present it | |
| | for approval to the Board. | |
| ACTION | The Secretariat to meet to fill in the survey on the implementation of the | |
| 16.4 | BSSD requirements for RPE jointly before 31st December. | |
| ACTION | Secretariat (SEPA) to write to Magnox confirming that RWA Bord is | |
| 16.5 | content with proposals. | |
| ACTION | Board Member (SEPA) to write to EDF to raise the RWA Board's concerns | |
| 16.6 | about the impact on their Corporate RWA arrangements due to the | |
| | reduction in EDF sites and available -staff as a result of the transfer of AGR | |
| | sites to Magnox. | |
| ACTION | Board Member (SEPA) to write to RPA2000 confirming the Secretariat's | |
| 16.7 | interim advice is now confirmed as permanent advice i.e. that they | |
| | should no longer apply reciprocal arrangements for recognition of RWAs | |
| | based on existing RPA certification unless that accreditation was | |
| | obtained prior to January 2022. | |
| ACTION | Board Member/Secretariat (NIEA) to request that RWAs are added to | |
| 16.8 | the Register of Regulated Professions and Secretariat (SEPA) to respond | |
| | to the enquirer. | |
| ACTION | Secretariat to find a suitable date for the next meeting. | |
| 16.9 | | |

4. RPA Statistics

Secretariat (EA) detailed that while there was a dip in RWAs in 2022 this slightly increased in 2023, with a moderate increase in RWAs overall (8).

RPA2000 website notes a 3 month application/renewal processing period. The board noted that while the median is <3 months, a processing time of greater that 1 year has been reported. The requests for further information and the voluntary nature of assessors were proposed as possible reasons for such delays. This item to be discussed in more detail at a future board meeting once explanation(s) received from RPA2000.

ACTION 16.1: Secretariat (EA) to contact RPA2000 to query the length and reason(s) for delays in application and renewal processing times.

5. Publication of Minutes from RWA Approval Board on SEPA's Website

Minutes from RWA Approval Board meetings are not currently being published. Secretariat (SEPA) confirmed that SEPA can publish them on its website. It was suggested using job titles rather that names to ensure appropriate confidentiality. It was proposed that a separate register

of attendees could be kept. Meeting attendees confirmed that they were happy for minutes to be published.

ACTION 16.2: SEPA to publish the agreed, name redacted minutes of meetings on their webpage going forward.

6. Review of Syllabus

Secretariat (EA) confirmed the required amendments to reflect EU exit had been actioned.

It was agreed that the Shipment of Sources regulations would be included under 10e.

Wording of Section 13c was discussed with concerns raised that it was not addressing the issues raised about Waste Acceptance Criteria.

ACTION 16.3: NILG, SULG and SNNILG members to meet and agree a proposed form of wording that will work for nuclear and non-nuclear users and present it for approval to the Board.

7. Survey on the implementation of the BSSD requirements for RPE.

ACTION 16.4: The Secretariat to meet to fill in the survey jointly before due date (31st December).

8. Proposed changes to Magnox Corporate RWA arrangements

Secretariat (SEPA) detailed that SEPA have received a letter outlining Magnox's proposal to apply their current Corporate RWA arrangements to the Advanced Gas cooled Reactors (AGR), initially Hunterston B and Hinkley Point B, being transferred from EDF to Magnox. The Secretariat confirmed that they are content with the proposals, with any further issues to be flagged by site inspectors.

The potential impact on EDF's Corporate RWA arrangements due to the reduction in EDF sites and staff was flagged.

ACTION 16.5: Secretariat (SEPA) to write to Magnox confirming that the RWA Board is content with the proposals.

ACTION 16.6: Board Member (SEPA) to write to EDF to raise the RWA Board's concerns about the impact on their Corporate RWA arrangements due to the reduction in EDF sites and staff.

9. Reciprocal arrangements for RWAs who hold RPA Certificates.

The Board discussed their on-going concerns around the changes to the RPA accreditation requirements and the impact of this on the reciprocal arrangements for RWAs who hold RPA Certificates. Concerns remain around the use of membership of all the professional societies to demonstrate competency. The Board agreed that they can't accept the current RPA accreditation to demonstrate competency for RWA accreditation.

ACTION 16.7: Board Member (SEPA) to write to RPA2000 confirming the Secretariat's interim advice is now confirmed as permanent advice i.e. that they should no longer apply reciprocal arrangements for recognition of RWAs based on existing RPA certification unless that accreditation was obtained prior to January 2022.

10. AOB

It was highlighted that RWAs are not currently included on the Register of Regulated Professions and it was agreed that they should be.

ACTION 16.8: Board Member/Secretariat (NIEA) to request that RWAs are added to the Register of Regulated Professions. Secretariat (SEPA) to respond to the enquirer.

11. Next meeting

The next RWA approval board meeting TBD and will be chaired by the NRW approval board member.

ACTION 16.9: Secretariat to find a suitable date for the next meeting.

Meeting closed.