Radioactive Waste Adviser Approval Board

Note of meeting

19 May 2025

Present: Board Member (NRW) chair for this meeting, Secretariat (NRW) note taker for this meeting, Board Member (EA), Secretariat (EA), Board Member (SEPA) Secretariat (SEPA), Board Member/Secretariat (NIEA), Nuclear Board Member (NILG), Non-Nuclear Board Member (SULG), Non-Nuclear Board Member (SNNILG).

1. Welcome and introductions

Board Member (NRW) welcomed everyone to the meeting and noted that we were quorate.

2. Review of constitution

The board confirmed that they were generally content with the constitution, noting the renumbering needed to section 11. (See Action 18.1)

3. Minutes of last meeting and actions arising

Minutes of the meeting held on 18 November 2024 were reviewed and agreed.

Currently meeting minutes are published in redacted form on SEPA's website. However, SEPA is making changes to its arrangements for publishing documents on its website to reflect accessibility requirements. (See Action 18.2)

The actions were reviewed as below:

Action 17.3 Circulate revised wording of 13c in the RWA syllabus to NILG, SULG and SNNILG before amending. Secretariate (SEPA) to send revised wording to NILG and SNNILG.

The revised wording has now been shared with NILG and SNNILG in November 2024 and with SULG in January 2025.

Status – Complete.

Action 18.1 Secretariat (SEPA) to renumber the constitution prior to the next meeting. SEPA noted that accessibility requirements and website hosting needs to be reviewed to complete this action.

Status – Open

Action 18.2 Secretariat (SEPA) to ascertain SEPA's current document accessibility requirements for publishing on its website and the impact on publishing of the RWA Approval Board minutes.

This is linked to Action 18.1. SEPA's arrangements to meet accessibility requirements are continuing to evolve. Other regulators e.g. NIEA/NRW could potentially host the minutes and NRW is exploring whether it would be possible to host on NRWs website.

Status – Open

Action 18.3 Secretariat (EA) to advise RPA2000 of the planned revised wording of 13c in the RWA syllabus.

Status - Complete

Revisions to the RWA syllabus were discussed, including of 13c and the need to verify that references to legislation etc remain valid.

Action 19.1 SEPA took an action to review the syllabus and circulate within the secretariat and then to send by correspondence the completed version for agreement by the board. Any changes to the syllabus may require re-publication on the website which requires similar considerations to 18.1 and 18.2. As an alternative to re-publication on the website, a note can be added to the website advising that the revised syllabus is available on request.

Status – Open

Action 19.2 Once the syllabus is updated, the board agreed that relevant organisations such as CRWAs should be informed. A communique will be drafted and shared amongst the secretariat. It was also noted that regulatory staff should be made aware of the change.

Status - Open

Action 18.4 Secretariat (EA) to advise lead regulator for Springfields Fuels Ltd to progress their assessment of the proposed changes to the Corporate RWA group and advise the RWA Approval Board of the outcome.

Status – Complete (See item 5)

Action 18.5 RWA Approval Board to determine if it is content with the proposed revised Springfields Fuels Ltd Corporate Arrangements.

Status – Complete (see item 5).

Action 18.6 Secretariat (SEPA) to draft letter to RPA2000 on renewal portfolio evidence and circulate to board members by mid-December 2024.

The letter was sent to RPA2000 in January 2025.

Status – Complete.

Action 18.7 Secretariat (SEPA) to draft letter to RPA2000 on demonstration of underpinning evidence and circulate to board members by mid-December 2024.

The letter was sent to RPA2000 in January 2025.

Status – Complete.

Action 18.8 Secretariat (EA) to contact the RRSL regulator and request plan for going forward and timescale for assessing the Corporate RWA arrangements

Contact has been made, and an update will be provided at the next meeting.

Status – Open

4. Current SEPA investigation

SEPA gave a short briefing on an investigation into an operator over concerns that the full requirements of the CRWA are not being met. This is ongoing and SEPA will provide an update once complete.

Action 19.3 SEPA will provide an update on their CRWA investigation once complete.

Status - Open

5. Approval of revised corporate RWA (CRWA) arrangements at Springfield Fuels Limited (SFL)

The CRWA arrangements for SFL were last approved in 2017. Ahead of the meeting, the EA shared a document which gave a detailed assessment of the revised arrangements. The EA noted that the revision was required due to changes in site personnel over time and to ensure that the full requirements of CRWA continued to be met through sharing the RWA responsibilities across SFL. This included checking that the requirements are embedded within the organisations management systems. The assessment concluded that the arrangements met the requirements for SFL to be an approved CRWA. The board was asked to endorse this decision. Status – Approved.

The outcome of the assessment will need to be communicated with SFL. The EA proposed to email the site inspector, thanking them for their work in assessing the revised proposals, stating that the board is content and that they can advise the operator that their revised corporate arrangements are satisfactory, subject to an ongoing compliance inspection.

Action 19.4 EA to communicate to the site inspector that the revised CRWA requirements for SFL are satisfactory.

Status - Open

The landscape since the initial CRWA approvals has changed and the importance of reviewing operator management systems was discussed. It was proposed that regulators consider adding

a review of CRWA into compliance assessment plans. It was accepted that this would need time for planning and may not be part of this year's programme.

Action 19.5 Regulators to consider adding a review of CRWA into compliance assessment plans for the 2026/27 inspection period. Further discussion will be had at the next board meeting.

Status – Open.

6. AOB

No other items raised.

7. Next meeting

To be chaired by NRW.

Action 18.9: Secretariat to find a suitable date for the next meeting.

This was proposed to be in 6 months time. The secretariat will find a suitable date.

Status – Open.

Meeting closed.

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