



HASS RECORD GUIDANCE

Version 1

2013

1 General

- 1.1 This guidance is intended to help HASS holders make clear, accurate and consistent records, to make the necessary reports to SEPA and therefore allow SEPA to maintain an accurate national inventory.
- 1.2 The records and reporting requirements are set out in Annex II of Council Directive 2003/122/EURATOM on the control of high-activity sealed radioactive sources and orphan sources (the “HASS Directive”), including which parts are mandatory and which are not. SEPA has changed the format and content from the one set out in Annex II so that your record keeping obligations are as clear and straightforward as we can make them – whilst satisfying the Directive’s requirements. SEPA has expanded on those requirements where this seems necessary for clarity and has added a small number of additional pieces of information which we think are necessary for an efficient and effective process.
- 1.3 You are required to keep a record for *each* HASS source you hold and report some of the information in that record to SEPA. SEPA does not need to maintain all the information which you need to keep within the national inventory. But, for simplicity and convenience, the HASS Record form has been reproduced as a schedule of your registration and it can be used to make reports to SEPA. The Record schedule can be photocopied and completed by hand. However, an electronic version (in PDF format) can be obtained from SEPA’s web site and this can be completed electronically. The title of the document is the HASS Record (RSA10). The SEPA web site address for these forms is:

http://www.sepa.org.uk/system_pages/application_forms.aspx

Please note that the form is classified as “restricted” when you have completed it, and you will need to keep this document in an appropriate manner in accordance with this security classification. SEPA cannot receive reports electronically as sending them across the internet is not sufficiently secure for this information. You will need to send a paper copy to the address notified to you by SEPA. Do not, under any circumstances, send the completed form to any other SEPA address or person.

For reports to SEPA, the address to which the completed form is to be sent is:

**SEPA
Aberdeen Registry
Inverdee House
Baxter Street
Torry
Aberdeen
AB11 9QA**

- 1.4 It is important that you keep and maintain accurate records. Similarly, it is important that the first report you send to SEPA concerning sources that you have recently received, and any subsequent reports telling SEPA about changes, are made promptly. Your registration confirms the timescales you must work to and the changes SEPA needs to know about – and they are summarised below. This will allow SEPA to maintain up-to-date records and will help to ensure that our site inspectors have a clear understanding of the sources you hold when they make compliance assessment visits. Importantly, clear and prompt reports will let SEPA

track the locations of HASS sources and will help to maintain high standards of source control and management, regulation and environmental protection.

- 1.5. The record and reporting contents and formats explained here are essentially common across all the UK 'HASS' regulators. SEPA thinks that this is important so that HASS holders have a clear understanding of their obligations – irrespective of where they are located. The UK regulators have a common database so common record formats allows us to share information – we want to provide for a UK-wide source tracking system - and to migrate records efficiently into the future system we are now developing.
- 1.6. Should you have any queries or difficulties in completing the form, please contact your site inspector in the first instance.

2 Formatting

Addresses and dates

- 2.1 Please use the UK standard address format (building number or name & road, town, county or equivalent and postcode). For manufacturers, suppliers or previous users from abroad, add their country.
- 2.2 Please use the date format DD-MM-YYYY.

3 Record Contents

3.1 Making and amending records

- 1a. Date record made*
1b. Replaces record made on
1c. Amends information about

Most of the information you record about each source will not change during the time you keep that source. But you will need to make new, replacement records and report those changes to us if you:

- apply for and receive a new registration
- change the equipment in which a source is kept
- intend to keep, use or store a source permitted for mobile use at another location for longer than three months
- transfer the source to someone else
- lose, have stolen or recover a source
- need to correct information you have reported before

For clarity, to ensure that a changed record can be clearly linked with the record it replaces and to make plain what changes you are reporting, these record items allow you to confirm when and what changes have been made. At 1c., your first report about a HASS should be marked as such. Subsequent reports should list the record items now being changed.

1d. Below exemption level on

SEPA needs to know when the HASS to which this record relates has decayed below the relevant threshold level. When it has, please complete this section with that date.

*1e. Contact name for this record**1f. Contact's telephone number*

SEPA may need to speak with you to confirm the detail of your report – if your report is complete and clear, we will not.

3.2 Identifying the source*2a. Source identifying number*

Source manufacturers should supply customers with a document confirming the identifying number inscribed on the source – and the intended holder should not accept delivery of a source from a source manufacturer, supplier or previous holder without appropriate accompanying documentation confirming this and other information. You should record the identifying number as supplied, and should not try to confirm its accuracy by examination of the source itself.

*2b. Name of Source Manufacturer or Supplier**2c. Address of Source Manufacturer or Supplier*

If the manufacturer of the source is located outside the European Union, the name and address of the importer or supplier may be recorded instead. The intention is to identify a European 'entry point' at which a source first enters a regulatory and record system maintained within one of the Member States. Its movements, until it leaves that system of control, can then be tracked and transfers reconciled. As yet, no truly international tracking system exists and these arrangements seek to make the most of the current arrangements.

Please add either [M] or [S] to the name recorded at 2b to confirm whether this is the manufacturer or the supplier. For older sources whose provenance is uncertain, but only after having made reasonable efforts to discover these details, you should enter 'not known'.

2d. Equipment identifying number

Other than during the manufacturing process, sources will usually be installed in some form of equipment, for example a gauge, irradiator, exposure assembly, storage or transport container. It is important to associate each source with the equipment in which it is currently installed. Sources are commonly delivered in a transport container for subsequent installation in a holder's equipment. You should record the identifying number of *your* equipment and amend that record if you later move the source to different equipment. Changes which are of very short duration need not be reported to SEPA.

Some sources are delivered in equipment and may remain there throughout their working life. Equipment should come from its manufacturer, supplier or previous holder with documentation confirming the equipment's identifying number together with confirmation of the source it contains. You should confirm that the equipment

identifying number supplied to you matches that marked on the outside of the equipment, and record that number. Holders of sources not installed in equipment should mark this section as 'not applicable'.

2e. Equipment manufacturer

2f. Equipment manufacturer's address

You may acquire equipment for which the original manufacturer is not known – in which case you should make reasonable efforts to confirm this information. If necessary, confirm that the manufacturer is 'not known'. If the manufacturer of the equipment is located outside the European Union, the name and address of the importer or supplier may be recorded instead. Where this is the case please add [I] or [S] to the name you record at 2e.

2g. Practice

2h. Associated activity

Please complete these sections by confirming the practice and activity for which this source is to be used – consistent with the description used in your registration.

3.3 Identifying the HASS holder

SEPA needs to know clearly who you are. This is so that SEPA can avoid confusion between you and other organisations of similar name – and between different parts of your own organisation, which may hold and manage sources at different locations. SEPA also needs to be certain who has responsibility for sending records to us.

3a. Holder's name

Please record the name of your organisation, as used when applying for registration to hold a source of this type.

3b. Holders address

This section should confirm your registered office or principal place of business, not the current location of the source. Please ensure that this matches the address on the face of your registration.

3c. Organisation's identifier

Many HASS holders will be businesses who have had to register with Companies House for other purposes. If this applies to you, you should record your Companies House Registration number here.

3d. Type of Holder

Please confirm here whether you are holding *this* source because you are its *manufacturer*, as a *supplier*, as a *user* or because you are storing the source.

3.4 Location of HASS

4a. Use

4b. Usual source location

You should record here the address of the premises where you usually keep, use or store the source. If the source will only be used at these premises, you should record it as *fixed* use at 4a.

4c. Other source location

If this source has been registered under section 10 of the Radioactive Substances Act 1993 you should record this source as for *mobile* use at 4a. SEPA, or the police, may wish to inspect your arrangements at any of the locations where you keep, use or store the source. But, to allow SEPA to plan our visit programme, we need to know when the source is being kept, used or stored for an extended period at somewhere other than its usual location. If the source is, or is likely to be, kept at another single location for longer than three months, please record that address here.

3.5 Your Permission

5a. Permission number

5b. Date it became effective

5c. Date of expiry

SEPA of course already know this information but it will be helpful to us and allow you to keep clear records if we ask you to confirm the details here. You should record here the reference number on the face of your registration, together with the date it became effective. In some cases SEPA issues registrations which are time-limited, and if this applies to your permit you should record the date here.

3.6 Operational information

This section is to enable you to record source leakage tests - events that are important in demonstrating compliance with the requirements of your registration. SEPA will not record this information. When you amend a record to reflect a recent leakage test you need not report this to SEPA unless you are also telling us of other changes.

Your registration requires you to maintain a record of source movements within your premises and, where the registration allows mobile use, to and from other locations. You will need to keep separate records for those purposes – you should not report those movements.

3.7 Characterising the Source

The information you provide here will help SEPA to identify sources that are lost or are found and may be important in responding to an incident involving this source.

7a. Radionuclide

Please specify this in the form cobalt – 60, iridium – 192, etc.

7b. Date of manufacture

7c. Activity at that date

7d. Other reference date

7e. Activity at that date

One purpose of this section is to record a date on which the activity of the source can be confirmed and therefore allow the activity at any later date to be calculated. This may be specified for a reference date which is not necessarily the date of manufacture. But the date of manufacture is of further importance, as it defines the age, rather than activity, of a source – useful where a comparison with its designed working life is of relevance. Therefore, please record all the available information relevant to this section. Please use the standard scientific prefixes and the abbreviation Bq. Recorded activities should be rounded.

Further Source Characterisation details

These items are optional - where a source has been manufactured to ISO 2919 most of this information will be contained within the certificate supplied with the source.

7f. Physical and chemical characteristics

Where concise information is available, for example 'Cs Cl pellet in double stainless steel capsule', please record it here. Where further information is held, you may wish to retain this separately. Otherwise, please record 'not known'.

7g. Source type

SEPA is not aware of a comprehensive, industry-wide Type classification scheme which might be adopted here. Where known, please record here the 'model number' assigned by the manufacturer.

7h. Capsule identification

7i. ISO classification

7j. ANSI Classification

Where this information is available to be recorded, it will be of alphanumeric form and should be recorded as such.

7k. Special form certificate number

7l. Date of expiry of Special Form Certificate

This certificate affects the type of container necessary to transport the source. Where you are able to complete this section we believe that you should do so as it may be of value in some responses to events involving the source.

3.8 Receipt of HASS

8a. Date of Receipt of this Source

Please record here when you first received the source or equipment from the manufacturer or your supplier or previous user.

8b. Name of consignor

8c. Address of consignor

8d. Type of consignor

Please record the consignor's declared name and address. Also record whether the consignor is the *manufacturer* of this source or equipment, its *supplier* or is a previous *user*. If you have already supplied this information in Section 2 put "As Section 2".

3.9 Source Transfer

9a. Date of transfer of this source

Where appropriate, please record here the date when you transferred the source or equipment to the management of another organisation.

9b. Name of recipient

9c. Address of recipient

9d. Type of recipient

9e. Recipient's Permission Number

Please record the recipient's declared name and address. Also record whether the recipient is a *manufacturer* of HASS or equipment containing HASS, is a *supplier* of HASS or equipment containing HASS, is the next *user* of this source or equipment, is a person permitted for *short-term storage* of waste sources, is someone who will *recycle* the source or is a facility on a nuclear-licensed site for *long-term storage* or *disposal* of waste sources.

SEPA also requires you to obtain and record the intended recipient's registration number under which it will keep this source, if that user is within the EU. SEPA will expect to see a complementary report from that new user, if it is in the UK, which will allow us to reconcile our records.

Where you pass a source to a carrier for delivery to the intended recipient, you should *not* report this as a separate, intermediate transfer.

3.10 Further Information

This section is only for completion when a relevant event has happened. Conditions of your registration already mean that you must notify SEPA promptly of unusual events of this sort. However, you need to also amend your record and report that change to us – a reporting requirement in addition to the existing need for prompt notification.

10a. Date of loss

10b. Date of theft

10c. Date of recovery

You should record relevant dates. These details will allow SEPA's records to readily identify sources which at any time are not under management controls. Events like these will mean that you and others will initiate comprehensive investigation, response and recovery arrangements – whose details and conclusions will be kept in separate but associated records which are addressed by separate conditions in your certificate of registration.