

Qualified Experts for Radioactive Waste Management

Consultation Response Form

The UK Environment Agencies are inviting written (preferably by email) responses to this consultation by Friday 14 January 2011. To aid analysis of responses, it would be helpful if you could submit your response using the form below. Please provide details and evidence, as appropriate, to support your response in the space provided, continuing onto a separate sheet of paper if necessary.

Please send your completed Consultation Response Form, including any supplementary information you may wish to include, to:

QEconsultation@sepa.org.uk

Or

QE Consultation
Radioactive Substances Policy Unit
Scottish Environment Protection Agency
Erskine Court
Castle Business Park
Stirling
FK9 4TR

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Name of contact:													
Name of Organisation (if applicable):													
Address:													
Telephone number:													
Email address:													
Please cross one box from the following list that best describes you:	<table><tr><td><input type="checkbox"/> Individual</td><td><input type="checkbox"/> Regional Organisation</td></tr><tr><td><input type="checkbox"/> Small to Medium Enterprise</td><td><input type="checkbox"/> Devolved Administration</td></tr><tr><td><input type="checkbox"/> Large Enterprise</td><td><input type="checkbox"/> Local Government</td></tr><tr><td><input type="checkbox"/> Professional Society</td><td><input type="checkbox"/> Central Government</td></tr><tr><td><input type="checkbox"/> Legal Representative</td><td><input type="checkbox"/> Other (Please specify):</td></tr><tr><td><input type="checkbox"/> Interest Group</td><td></td></tr></table>	<input type="checkbox"/> Individual	<input type="checkbox"/> Regional Organisation	<input type="checkbox"/> Small to Medium Enterprise	<input type="checkbox"/> Devolved Administration	<input type="checkbox"/> Large Enterprise	<input type="checkbox"/> Local Government	<input type="checkbox"/> Professional Society	<input type="checkbox"/> Central Government	<input type="checkbox"/> Legal Representative	<input type="checkbox"/> Other (Please specify):	<input type="checkbox"/> Interest Group	
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No	Proposition	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
1	<p>There are benefits in clarifying the expectations of the environment agencies on QEs.</p> <p><i>Supporting information:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2	<p>Experience is a key component of competence.</p> <p><i>Supporting information:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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3	<p>The proposed scope of the competence framework (Annex A) is appropriate to the role of an adviser to employers on radioactive waste management and environmental radiation protection.</p> <p><i>Supporting information:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
4	<p>The syllabus fully describes the knowledge and experience requirements of a Qualified Expert.</p> <p><i>Supporting information:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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5	<p>The adoption of the GA, BU, DU approach is appropriate.</p> <p><i>Supporting information:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
6	<p>The three levels of experience proposed are appropriate.</p> <p><i>Supporting information:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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7	<p>There is a high degree of alignment between the RPA and QE syllabuses and so the effort required to “extend” an RPA to a QE is likely to be tolerable.</p> <p><i>Supporting information:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8	<p>The clarification of the competences of a Qualified Expert and the proposal to leave the decision about suitability with the employer will result in increased clarity and improved consistency.</p> <p><i>Supporting information:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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9	<p>It will be beneficial if all three environment agencies take a similar approach to assessing suitability.</p> <p><i>Supporting information:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10	<p>It is not appropriate for the environment agencies to prescribe a re-assessment process - that should be left to approved Assessing Bodies.</p> <p><i>Supporting information:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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11	The proposed level of prescriptiveness for the environment agencies Approval Board for Assessing Bodies is appropriate.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Supporting information:</i>						
12	The proposed scope of interest of the Approval Board is appropriate.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Supporting information:</i>						

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13	<p>The proposed function of an Assessing Body is appropriate.</p> <p><i>Supporting information:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
14	<p>The proposals for Corporate Qualified Experts and the arrangements for approving them are appropriate.</p> <p><i>Supporting information:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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15	<p>There are no other key organisations that need to input to the implementation of the proposed arrangements.</p> <p><i>Supporting information:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
16	<p>The proposed timescale for implementation of the proposals is appropriate.</p> <p><i>Supporting information:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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17	The proposals for “grandfather rights” are suitable and reasonable.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Supporting information:</i>						
18	It is appropriate that a certified RPA should be given a credit for their RPA competences when they are considered for Qualified Expert status.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<i>Supporting information:</i>						

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19	<p>How credit for RPA competences is given is an issue for the Assessing Bodies not the environment agencies.</p> <p><i>Supporting information:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
20	<p>The proposed term “Radioactive Waste Adviser (RWA)” is a suitable title for a person fulfilling the role of a Qualified Expert for the purposes of environmental radiation protection and radioactive waste management.</p> <p><i>Supporting information:</i></p>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>