

NOTES OF A MEETING

RWA APPROVAL BOARD

08 October 2013

Friends Meeting House

London

Present:

Joe McHugh (EA; Chair)

Alan Muir (GSK; Non-nuclear)

Paul Kayente (Nuvia; Non-nuclear)

Jim Gemmill (SEPA)

Ian Warner (Magnox; Nuclear)

Angela Wright (Secretariat; SEPA)

Linda Peake (Secretariat; NIEA)

Laurence Austin (EDF; Nuclear)

Chris Englefield (Secretariat; EA)

1. Joe McHugh (JoM) welcomed Board members. Agreement was sought and given on the rest of the agenda.

2. The actions of the previous meeting were briefly reviewed. One on-going action is the attempts to identify an additional Board member who would be chosen by virtue of their being wholly independent of the regulators and the nuclear and non-nuclear sectors. This is still proving problematic but the search continues. One issue is the question of whether their expenses could be reimbursed.

3. The Secretariat gave an update on the Grandfather Rights (GFR) exercise:

- 783 certificates were issued.
- Approximately 40% of those were in response to applications from individuals working within the nuclear industry.
- The Secretariat expect a significant number of GFR holders to be unwilling or unable to meet the demonstration of competence that will be required to be made to the certification body by no later than 30 June 2016. The original estimate of 540 RWAs in the UK is still considered to be the most reliable number.
- It was noted that more applications were received from people currently working in the nuclear industry than had been expected, presumably as they see RWA status as a good career development move.
- It was agreed that the list of RWA GFR holders should not be published due to data protection issues and because we had not expressed our intention to do this at the time of application.

4. The Secretariat reported on recent discussions and correspondence with RPA2000 (an approved Assessing Body).

Action – Secretariat to circulate correspondence to RWA Approval Board members

- RPA2000 have certified three demonstration RWA portfolios (received from RPA Assessors).
- A total of 14 RWA Assessors have been selected by RPA2000 to date.
- A considerable concern is that no applications have been received. RPA2000 representatives and the RWA Secretariat met in Edinburgh in September 2013 to discuss this problem. It was agreed that a joint action plan should be adopted to enable encouragement of applications. There is now likelihood that RPA2000 will not be able to meet the demand for assessments by the time the designated expiry of the GFRs.

- RPA2000 are likely to publish a closedown date beyond which any applications received will have no guarantee of completion of determination before GFRs expire. This would mean that some RWAs will be unable to function in this capacity after 30 June 2016.
- It was agreed that an awareness raising campaign of this issue is required (by joint working of RPA2000 and the regulators) to strongly encourage applications to be expedited.
- In addition, the message will be promulgated via the Scottish Non-Nuclear Industries Liaison Group and Small Users Liaison Group.

5. Following a discussion on any potential changes to the RWA scheme with the implementation of the revised Basic Safety Standards, the RWA Approval Board took a strategic view on the implications of the new Basic Safety Standards on the RWA entity. It was agreed that a discussion with the radiation protection profession would be beneficial in order plan for changes post-new BSS. It was also noted that the “corporate” approach remains part of the scope of RPE options described in the new BSS.

Action – AW to include implementation of the revised BSS on the Risk Register and any other updates required.

Policy developments – it was noted that SEPA has published a Regulatory Position Statement on RWAs and that the Northern Ireland Environment Agency is following a similar position. The Position Statement describes what changes have been made to new authorisations issued under the Radioactive Substances Act 1993 and how SEPA will regulate existing authorisations that do not yet have the changes varied in.

6. The board then turned to Corporate RWAs (CRWAs). A brief review of the CRWA application assessment process was presented by the Secretariat. The fact that two applications have so far been received was noted, with determination needing to be completed on all applications received by 30 June 2016. One applicant has been asked for additional information which had not yet been received (at the time of the meeting). It was emphasised that the HR management component of applications was key, and that mapping of post to individual RWA competences was proving to be an essential requirement. It was reported by the nuclear industry representatives that they are broadly happy with the RWA framework and did not want detailed proscriptive guidance from the regulators. An unanticipated consequence of the CRWA is that quality assessors are asking for information about how approval of a site’s arrangements will be made. The Nuclear Industry Liaison Group will be used as conduit to ask the nuclear industry about the timing of other applications to make sure that industry stays on programme.

Discussion was held on the draft process for assessing CRWA applications. RWA Approval Board members were asked what level of detail they wanted to receive on CRWA applications, i.e. whether they wanted the full application or just the decision document, and it was agreed that in the first instance they just wanted the decision document.

Action – AW to send draft CRWA application arrangements and decision documents to RWA Approval Board

7. It was agreed that the work of the RWA Approval Board should be disseminated via a joint paper. The paper is to include a description of the role and work of the Board.

Action - CE to draft with input from LP and AW

The possibility benefits of juxtaposing two papers was discussed, with the possibility of one by the industry representatives alongside one from the regulators.

Natural Resources Wales (NRW) has been invited to join the RWA Approval Board and Bob Russ is to be kept informed of meetings and other matters relating to the RWA Approval Board.

Action –Secretariat to include NRW in any RWA Approval Board correspondence

It was agreed that a RWA Update should be produced to provide an update on the RWA Approval Board meeting and encourage RWAs to make early application to RPA2000 to meet the deadline of 30 June 2016 when grandfather rights end.

Action – AW to produce RWA Update

8. Any other business.

- NDAWG has noted a national shortfall in competence resources for Dose Assessment. This is a strategic issue for the UK and it should be addressed. It is notable that some academics provide this as a service to industry, but far fewer such specialists are now in direct employment of the nuclear industry. Will this impact on CRWA approvals? What can the UK RP profession do to address the issue?

9. The next meeting will be held in late April. 23 April is the proposed date. It was agreed that the strength of the agenda will be tested one month beforehand. This might take the form of: Is there at least one CRWA application that has been reviewed by the RWA Secretariat and will be tabled with recommendations to the RWA Approval Board on determination from the Site Inspector and the RWA Secretariat?

It was agreed that Joe McHugh will act as Chair for the next meeting.