

RADIOACTIVE WASTE ADVISER APPROVAL BOARD MEETING

26 MAY 2016

ENVIRONMENT AGENCY OFFICE, GHYLL MOUNT, PENRITH

NOTE OF MEETING

Attendees: In person - Jim Gemmill (SEPA), Jo Nettleton (EA), Peter Farrell (NILG), Kate Griffith (EA) By telephone – David Bruce (NIEA), Stephen Wilson (NIEA), Dave Bennett (EA), Laurence Austin (NILG), Penny Wade (SNNILG), Angela Wright (SEPA)

1.0 Welcome and Apologies

Jim Gemmill welcomed everyone to the meeting and outlined the agenda for the day. Apologies had been received from Andy Gibbs (NRW) and Sheila Liddle (SULG).

2.0 Actions from the last meeting

Action 7.1: AW/KG to redraft the constitution to incorporate the confidentiality paper into the constitution and circulate to the members for comment. Once agreed to be added to the SEPA website. (3 months).

Completed

Action 7.2: KG to draft a letter for JN to sign confirming that we were satisfied with the arrangements subject to the proposed inspections (1 month).

Completed

Action 7.3: DB/JG to ensure that contact is made with nuclear permit holders not on the above list to see whether they intend to apply for CRWA (2 months).

Completed

Action 7.4: KG to draft a letter for JN confirming the approval of EDF's arrangements (1 month).

Completed

Action 7.5: KG to arrange telecon with RPA2000 for an update before the next Approval Board.

Completed

Action 7.6: JN to confirm that the timescales are acceptable to the EA nuclear regulators.

Completed

Action 7.7: AW/KG to amend the guidance as above and circulate to board members, before publication on the SEPA website.

Completed

Action 7.8: PF to communicate these responses informally to EARWG members.

Completed

Action 7.9: AW to inform NILG organiser (currently Mike Baggs from the EA) when amended guidance is published on SEPA website.

Completed

Action 7.10: DB, JG & KB/SW to consider how charging for CRWA assessment in the non-nuclear sector could be implemented, and report back at the next board meeting.

Completed

Action 7.11: AW to ensure that the extension of CRWA to non-nuclear and prospective nuclear permit holders together with removal/rescinding of CRWA status is added to the agenda for the next meeting.

Completed

Action 7.12: KG to send follow up email to EA nuclear team leaders.

Completed

Action 7.13: AW to inform NILG when new documents added to SEPA's RWA webpage.

Completed

Action 7.14: AW to arrange dates and venue for future meetings.

Completed

3.0 Determination of Dounreay Site Restoration Ltd's Corporate RWA application

Doug McGeachin (Dounreay Site Restoration Ltd) and Linda Buchan (SEPA) joined the meeting for this item.

Doug McGeachin outlined DSRL's arrangements for their CRWA. The arrangements are overseen by a CRWA Board which has representatives of senior managers covering the disciplines in the syllabus. The arrangements are based on DSRL's existing procedure for assessing competence.

Linda Buchan outlined SEPA's assessment of DSRL's CRWA arrangements and explained that the arrangements covered both DSRL's nuclear site and its' adjacent Low Level Waste disposal site as there are separate authorisations for each site.

There were some questions on how the sampling of advice to ensure consistency would work and it was agreed that this should be part of a SEPA inspection in about six months' time to check the implementation of the arrangements.

The RWA Approval Board approved DSRL's arrangements and thanked Doug McGeachin and Linda Buchan for their comprehensive presentations.

Action 8.1: AW to draft letter for DSRL approving their arrangements and notifying them that there will be an inspection in about six months' time to assess the implementation of their CRWA arrangements focussing on consistency of advice.

4.0 Determination of Urenco UK Ltd's Corporate RWA application

Catherine Sykes and Mike Peers (Urenco) and Kate Simpson (EA) joined the meeting for this item.

Mike Peers gave an overview of the Capenhurst site and Catherine Sykes gave an overview of Urenco's arrangements for their CRWA which will include advice to their tenants who are part of the same parent company.

Kate Simpson outlined the EA's assessment of Urenco's CRWA arrangements.

There was some discussion on the relationship between the three companies on the site and how advice would be sought from Urenco by the tenants.

The RWA Approval Board agreed that the arrangements were approvable in principle but that the role of the Integrated Waste Meeting and how it fits into the arrangements is unclear. The RWA Approval Board asked Urenco to provide the Terms of Reference for the Integrated Waste Meeting and a schematic of how it fits into the arrangements. If that information can be submitted in time it will be considered at the RWA Approval Board meeting on 9 June.

Action 8.2: KG to send out an email to formally request this information.

5.0 Update from RPA 2000

Feedback from RPA 2000 is that 104 applications were received in 2014, 46 in 2015 and 14 in 2016. All applications received by end 2014 had either been completed or were with assessors (20 are still with assessors). RPA 2000's intention is to monitor the processing of the outstanding 20 applications very closely to achieve the end June 2016 deadline. RPA 2000 plans to finish processing of the remaining Grandfather Rights (GR) holder applications by March 2017 at the latest, subject to there not being a large input of new (non GR) applications for RWA certification, which would have to be processed in a much shorter timescale, delaying the processing of GR applications. The outstanding GR applications will be processed in sequential order, based on date of receipt. RPA 2000 is writing to applicants who are waiting for their applications to be processed to let them know these timescales.

6.0 Corporate RWA

- a. Extension to prospective permit holders and timing of CRWA applications from New Build operators

It was agreed that prospective permit holders for new nuclear build should be allowed to apply for approval of their CRWA prior to application for their permit as an RWA should be involved in advising on the application. The EA provides advice and can charge for that advice, under Section 37 agreements with new nuclear operators and if that can be extended to include charging for assessing CRWA arrangements then it should be acceptable.

Action 8.3: DB to find out if Section 37 agreements can be amended to include charging for the assessment of CRWA arrangements for new nuclear operators.

Action 8.4: KG to amend paragraph 4.2 of the Guidance on CRWA to include sites with Section 37 agreements.

- b. Extension of CRWA to non-nuclear permit holders

There was a discussion on whether non-nuclear permit holders should be allowed to apply for a CRWA and what types of permit holder might want to use CRWAs. It was agreed that the RWA Approval Board would carry out a review of the Environment Agencies' Statement on Radioactive Waste Advisers, RWA Syllabus and Guidance as it has been five years since

publication and to ensure that it still meets the requirements of the revised Basic Safety Standards Directive.

Action 8.5: JG and AW to set up a meeting to start the review of RWA scheme.

c. Removal of CRWA approval

There is no pressing need to clarify under what circumstances this might need to be carried out at present so it will be included in the overall review of the RWA scheme.

d. Update on status of other applications for CRWA

There are two CRWA applications, Springfields and AWE, ready for a decision by the RWA Approval Board teleconference on 9 June. No other applications are outstanding or expected at the present time.

7.0 Revised CRWA guidance

The propose changes were discussed and it was agreed that Kate Griffith would make some changes so the document can be published and circulated to NILG members and the guidance will also be reviewed as part of the wider review of the RWA scheme.

8.0 AOB

The RWA Approval Board had been asked to consider whether it was possible for industry representatives to claim expenses from the environment agencies for attending the meetings. JG, JN and DB explained that industry representatives were expected to bear their own costs, and the agencies could not fund travel expenses. The same principle applies for liaison meetings such as SULG, NILG and SNNILG. Telecon facilities are always available, and industry representatives are welcome to dial in. In the future it will be made clear to potential industry representatives that the environment agencies are unable to fund their attendance at RWA Approval Board meetings.

PW asked about any changes to the RWA scheme, particularly in the light of the new BSS. In the new BSS the RPE (Radiation Protection Expert) gives advice on the management and disposal of radioactive waste as well as the safety of workers. The current arrangements for RWAs fulfil the requirements for recognition as an RPE specialising in radioactive waste management. However the environment agencies had held some preliminary discussions

with other regulators and government bodies (HSE and Department of Health) about whether there is any possibility of harmonisation between the RPA and RWA roles, and the MPE but we have not set up formal working parties. There is more urgency in establishing a system for recognition of MPEs as there is no current arrangement in place.