



## Environmental Authorisations (Scotland) Regulations 2018

### GUIDANCE FOR SEALED SOURCE PERMIT APPLICATION FORM

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## **Introduction**

This guidance document relates to SEPA's Sealed Radioactive Sources Permit Application Form, which will allow you to apply under the Environmental Authorisations (Scotland) Regulations 2018 (EASR), for the management of sealed radioactive sources, including high-activity sealed sources (HASS).

The application form is to be used to apply for a new sealed source permit or vary the conditions and limits of an existing permit.

Please note that separate application forms are available for transfers; partial or full surrenders; and other permits and registrations. Please consult the SEPA [website](#) for the appropriate application form.

Full information on how to submit your completed application form and the relevant fee can be found within the Information Note on the SEPA [website](#).

## SECTION 1- GENERAL INFORMATION

### Type of Application

#### 1a. Please state which of the following applications you are making.

Please indicate which type of application is being made by ticking the appropriate box. Please use one form for each type of application. List the relevant permit under the Environmental Authorisations (Scotland) Regulations 2018 (EASR) which you currently hold.

Please refer to the *SEPA RSA Charging Definitions Guidance* to determine whether your variation is substantial, standard or admin. If in doubt please contact SEPA prior to submitting your application form.

### Applicant Details

#### 1b. Please provide details of the legal person who will hold the permit.

The person who will hold the permit may be an individual (or group of individuals), a partnership, a registered company or a public body. If the legal person is a partnership or a group of incorporated individuals, you may need to attach additional pages to the application to list these people.

Any permit issued by SEPA is a legally binding document. Therefore, it is imperative that you are correctly described in legal terms on the permit.

Depending on exactly what your legal status is will determine what information SEPA needs. There are 4 categories of legal status, and you will fall into only one of these categories. The required information to describe the applicant's legal status has been broken down into four options:

- Individual/sole trader
- Organisation of individuals/partnership
- Public body
- Company or corporate body

Please select one option. If in doubt, please contact SEPA before making the application.

Organisation of individuals may be a club or similar organisation.

### Site Details

#### 1c. Please provide details of the premises to which this application refers

Please provide the address of the site where the sealed sources will be managed, including its postcode and the main telephone of the site (e.g. reception).

For mobile source permit applications, this address would be the one where the sealed sources are normally kept, including those usually kept in other parts of the UK or elsewhere.

For offshore applications, please state the installation name, block number(s), field name and any satellite platforms and sub-sea manifolds associated with the site. Include block numbers and field names of the satellite platforms and sub-sea manifolds where these are different from the main installation.

**1d. Please give the grid reference of the main entrance to the premises**

Please provide the 10-digit national grid reference (NGR) for the main entrance to the site or for mobile source applications, the place where it will normally be kept. This should consist of 2 letters followed by 8 numbers, for example, SJ 1234 5678.

**1e. Please state the local government area in which the premises are situated**

Please choose which local government area the site is located in (e.g. Aberdeenshire, Dumfries and Galloway, etc.).

If you are based in England, Wales, Northern Ireland or further afield please select “outwith Scotland”. If your application is for an offshore installation please select “offshore installation”.

**1f. To meet with the requirements of this application you must have a recognised Justified Practice.**

All uses of radioactive material, including sealed sources, require to be justified in accordance with the Justification of Practices Involving Ionising Radiation Regulations 2004, as amended. Scottish Ministers are the competent authority for this legislation; however, SEPA cannot issue a permit unless a practice is justified.

A list of justified practices can be obtained from the gov.uk website.

**PLEASE NOTE THAT FAILURE TO TICK THIS BOX WILL RESULT IN THE APPLICATION BEING RETURNED TO YOU.**

## **Contact Details**

### **1g. Please provide details about the individual that we may contact about the application**

This question refers to the person authorised by you to be the primary contact for queries about the application. This could include a person within your organisation or those outside of the organisation such as consultants or Radioactive Waste Advisers (RWA's) or Radiation Protection Advisers (RPA's). Queries are likely to be of a technical nature.

### **1h. Please provide details of the contact and billing address for invoices to be sent**

The granting of a permit will attract an annual subsistence fee as set out in the Environmental Regulation (Scotland) Charging Scheme for the current year, available from SEPA's [website](#). This section identifies where any invoices from SEPA should be sent.

## **Remittance Information**

### **Please provide payment details for the application**

Most applications will attract an application fee, although some applications will not. For more information on the fee (or the reason why no fee is required) and the acceptable means of paying, please refer to the Environmental Regulation (Scotland) Charging Scheme for the current year which is available from SEPA's [website](#). If you have any doubt, please contact SEPA before submitting the application.

On the application, please indicate whether your application requires a fee (if not, why), the amount paid and the method of payment used. Where required, please ensure you submit proof of payment or we shall be unable to process your application.

**FAILURE TO PAY THE RELEVANT APPLICATION FEE WILL RESULT IN THE APPLICATION BEING RETURNED TO YOU.**

## **Declaration**

This section must be signed by a person that is authorised to sign on your behalf. If the declaration is being signed by someone outside of your organisation, he/she will also need to provide written evidence that they have been authorised to sign in that capacity.

Any person named on the application form should be informed that they have been so named and the contents of SEPA's Data Protection Notice made known to them.

## **Application Checklist**

This is an aide memoire to help you ensure all the required information has been included in the application.

If you have included any other documents or additional pages to support your application, please make sure that you have listed them here.

**FAILURE TO LIST ALL SUPPORTING DOCUMENTS MAY RESULT IN THE APPLICATION BEING RETURNED TO YOU**

## SECTION 2- FURTHER INFORMATION

### 2a. Please provide details in the table below of the sealed sources to be managed.

Please complete the table with the sealed sources you intend to manage. Please include both high-activity sealed sources (HASS) and non-HASS, but **do not** include any sealed sources held under General Binding Rules (GBR's) or Notification:

- 'Radionuclide' - state the full name of the element followed by the mass number of the isotope (e.g. 'Caesium-137');
- "Maximum Number" – state the maximum number of sealed sources containing that radionuclide you intend to manage.
- 'Maximum Activity (Individual)' - State the single maximum or highest activity of the source for each radionuclide that will be on the premises at any one time in Becquerels or multiples thereof (e.g. kBq, MBq, GBq). Each radionuclide should only be listed once;
- 'Maximum Activity (total per radionuclide)' – State the maximum total amount of activity for each radionuclide in Becquerels or multiples thereof (kBq, MBq, GBq). This is the activity aggregate of all sealed sources containing that particular radionuclide; and
- 'Purpose for which the sealed sources will be used' - List all the purposes for the specified radionuclide. Please use generic categories where possible (e.g. level gauge, density measurement, radiography). SEPA may ask for more detailed information during the determination process. The purpose will usually be more descriptive of how you are using the source than the justified practice.

For variations, it is only necessary to complete the table for HASS where you intend to hold new radionuclides or where there is a proposed change in the number/activity/purpose of an existing radionuclide. All HASS must be listed, including those already appearing on an existing permit in order to avoid confusion on what is to be authorised. In such cases it may be necessary to provide additional information on a separate sheet.

### 2b. Please provide details in the table below of the security category of each source and the aggregate security group of all sources

Please complete the table with each type of sealed source you intend to manage and state its individual security category and then state the overall aggregate security group for all sealed sources listed. Please use the *Guidance on calculating the category of sealed sources* document, available on our website. If granted, the permit will allow you to hold sources up to the top of IAEA Category 3. By completing this section you are demonstrating that you are able to calculate the category of all the sources you hold and help ensure that you can comply with this requirement. Please note that if the overall aggregated security group is Category 5, you should apply for a Notification rather than a permit.

**2c. Please provide details in the table below of the location where the sealed sources will be managed.**

SEPA needs to know exactly where each authorised sealed source will be managed on your premises. In the case of mobile radioactive apparatus, the location will be where the sources are normally kept. This information will be shared with the local Police Counter Terrorist Security Adviser in order to allow them to determine the appropriate level of security for the authorised sealed source(s).

- “Building or location name or number” – State the name or number of the location where the sealed source(s) will be managed (e.g. bottling plant area, Room 223, etc.).
- “Radionuclide” - State the full name of the element followed by the mass number of the isotope (e.g. ‘Caesium-137’). If sealed sources containing the same radionuclide are used in separate locations, please ensure that all locations where those sources are used are listed; and
- “Total Activity [Bq]” – State the total activity of all sealed sources containing that particular radionuclide in that particular location in Becquerels or multiples thereof (e.g. kBq, MBq, GBq). If there are multiple locations where registered sealed sources are managed, please ensure that all locations have been listed.

For variations, it is only necessary to complete the table where you intend to hold new HASS (new radionuclides) or where there is a proposed change in where existing radionuclides will be kept. All sealed sources must be listed, including those already appearing on an existing permit in order to avoid confusion on what is to be authorised. In such cases it may be necessary to provide additional information on a separate sheet.

**Financial Provision For HASS**

If you intend to hold HASS, you will need to have suitable and sufficient financial provision for those sources. If you do not intend to hold HASS, please mark this question as “N/A”.

**2d. What arrangements for financial provision for the safe management of any sealed sources that are also high-activity sources (HASS) do you have in place?**

Details of the provision of a financial security or any other equivalent means appropriate to the sealed source in questions, for the safe management of sources when they become disused sources must be provided before a permit containing HASS can be issued by SEPA. If suitable financial provision is not yet in place, you must provide the date on which it is expected to be in place.

Examples of suitable arrangements include:



- A documented agreement with the manufacturer or supplier to take back the source; or
- A documented agreement by a public body that the disposal will be underwritten by that public body (e.g. Department of Health).

Other forms of financial provision may be acceptable to SEPA. You should discuss these requirements at the earliest opportunity with SEPA in order to facilitate the application.

**2e. Do you intend to carry out your activities with the sealed sources away from your premises?**

If it is your intention that the sealed sources (or the device in which they are contained) will go off the site where they are normally kept in order to be used, you should tick the “yes” box and provide further details of these movements in the space given.

The type of information to be provided includes, but is not limited to:

- The frequency and duration that the sealed sources will be away from the place where they are normally kept;
- The manner in which the sealed sources will be transported; and
- Control measures, including security, when the sealed sources are away from the place where they are normally kept.

Please note that a permit for mobile sealed sources issued by SEPA is only valid in Scotland. If you wish to manage the sealed sources elsewhere in the UK, you will be required to have an appropriate permit from the EA (for England), NRW (for Wales) or NIEA (for Northern Ireland).

**New Permit Applications Only**

Schedule 8, paragraph 15(2) of EASR requires specific questions to be included in applications for new radioactive substances activities permits, and these have been reproduced, where applicable, in this section of the form. SEPA will inspect you to confirm that the information is present and to a suitable and sufficient standard.

Please note that if you are applying for a variation or surrender, these questions do not need to be answered.

Many of the requirements that SEPA will include in your permit are standard conditions and can be found on SEPA’s [website](#) along with the guidance. It is recommended that you read these conditions prior to making application. The specific standard conditions have been referenced to each question, where possible.

Some of these requirements will overlap with Health and Safety legislation requirements (e.g. local rules). There is no need to create separate documentation just to satisfy the requirements

of your permit. However, SEPA does recommend that you ensure that any existing documentation does cover public exposure situations.

In the interests of data protection, we recommend that you only use job or post titles and not individual names in answering these questions.

**2f. Please provide information on who is responsible and the organisational arrangements for protection and safety with regard to public exposure from managing the sealed sources.**

SEPA is looking for how you will control access to the radioactive substances. For example, the site manager is the only person who holds the keys to the room where the radioactive sources are kept, and the keys will only be released if they have been signed for. An organogram of the relevant part(s) of the organisation may be helpful to illustrate the relationships discussed.

The applicable standard conditions are A.2, A.3, A.4, A.6, B.4, B.7, D.1, D.2 and if the sealed sources are mobile- F.

Please note that this reflects your internal arrangements and should not be confused with the Fit and Proper Person test that SEPA undertakes to ensure that you are in control of the activity.

**2g. Please provide information on the competencies and training of staff involved in managing the sealed sources.**

SEPA expects that all staff who will be involved in the management of the sealed sources will have appropriate training. Training can include formal qualifications, specific radiation protection courses, toolbox talks and mentoring and should be commensurate with the level of responsibility the individual has in relation to the sealed sources.

The applicable standard conditions are A.2 and A.5.

**2h. Can you confirm that the design features of your premises and of the radiation sources will ensure adequate protection against public exposure and provide suitable security?**

SEPA expects that the design of your facilities and equipment will prevent a member of the public receiving an exposure.

You are also required to have a suitable site security plan in place to ensure the sources are kept safe. The CTSA should provide you with the documentation which describes the security measures required, including the site security plan. We will consult with CTSA to ensure security arrangements are adequate before issuing the permit.

The applicable standard conditions are A.6 and B.4.

**2i. Do you have emergency procedures relating to the sealed sources?**

SEPA expects that you will have appropriate emergency procedures in the event a sealed source becomes damaged, stolen, lost or otherwise has the potential to result in an unexpected public exposure. These procedures must include informing SEPA as soon as reasonably practicable.

The applicable standard conditions are A.9 and B.9.

**2j. Do you have arrangements to maintain, test, inspect and service the sealed sources and the relevant equipment and facilities to ensure they continue to meet the design requirements, operational limits and conditions of operation throughout their lifetime?**

SEPA expects that you will inspect, and maintain where necessary, the sealed sources and their associated equipment and facilities to ensure that the potential for an unexpected public exposure is minimised. The level of inspection, testing, maintenance and servicing should be commensurate with the exposure consequences. The arrangements may include service contracts by external specialists.

The applicable standard conditions are A.6, A.7 and B.4.

**2k. Please provide details on what you intend to do with the sealed sources when they are no longer needed.**

It is important that you consider how the sealed source(s) will be dealt with when they reach the end of their useful lives or you no longer have any use for them. SEPA recognises that circumstances may change during the course of managing the source(s), and this will be part of the routine inspections that SEPA undertakes to ensure that these plans change accordingly.

The applicable standard conditions are B.7 and B.8.

**2l. Please provide details of how you intend to provide quality assurance for the radioactive substances activity.**

SEPA expects that you will know how you intend to comply with the conditions and limitations of your permit and that you will periodically check that you continue to comply. This may be demonstrated by suitable environmental management systems that require audits of compliance against your permit. Accreditation against an ISO standard is unlikely to be sufficient by itself. The level of quality assurance should be commensurate with the risk.

The applicable standard conditions are A.1 and A.2.