

ENVIRONMENT AGENCIES' GUIDANCE ON RADIOACTIVE WASTE ADVISERS

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About this document:

- This guidance document combines three previous guidance documents (Guidance on roles and responsibilities of permit holders, Guidance on suitability of RWAs and Corporate RWA guidance).
- References to transitional arrangements and grandfather rights have been removed.
- The document refers to the revised 2013 BSSD and role of the Radiation Protection Expert.
- The Environmental Permitting Regulations 2010 has been updated to Environmental Permitting Regulations 2016 (as amended).
- The Environmental Authorisations (Scotland) Regulations 2018 has been included.
- Natural Resources Wales has been included in the list of environment agencies.

Contents

1	Executive Summary	4
2	Introduction	4
3	Radiation Protection Expert.....	5
4	Radioactive Waste Advisers.....	6
5	Roles and responsibilities of the permit holder	7
6	Role of the Radioactive Waste Adviser	8
7	What is a suitable RWA?.....	10
8	Determining suitability of RWAs	11
9	Corporate Radioactive Waste Advisers	12
10	How can organisations demonstrate their Corporate Arrangements?.....	13
11	What information needs to be submitted to the Approval Board for recognition of Corporate Arrangements?	15
12	Making an application for the approval of Corporate RWA arrangements.....	16
13	What is expected of a permit holder whose Corporate Arrangements have been approved?	17
14	Suitability.....	18
15	Examples of how a nuclear site might satisfy the requirement for RWAs.....	18
16	Further information.....	21

1 Executive Summary

1.1 This document explains that the environment agencies fulfil our obligations in relation to Radiation Protection Experts by requiring permit holders to appoint Radioactive Waste Advisers (RWAs). Here we:

- Explain what we mean by the term RWA.
- Specify what tasks we expect RWAs to perform and the associated responsibilities of the permit holder.
- Specify how a permit holder might determine the suitability of a RWA.
- Explain our scheme for the recognition of Corporate Radioactive Waste Advisers (a Corporate RWA is a group of individuals who collectively provide the RWA function for a permit holder at a specific site).

1.2 The document combines and replaces the previous guidance on roles and responsibilities of permit holders and RWAs; on the, suitability of RWAs and on Corporate RWAs.

2 Introduction

2.1 The Basic Safety Standards Directive (BSSD 2013) sets basic standards for the protection of the health of workers and the general public against the dangers arising from ionising radiation. It sets out the role of the “Radiation Protection Expert” (RPE) as is “an individual, or if provided for in the national legislation, a group of individuals having the knowledge, training and experience needed to give radiation protection advice in order to ensure the effective protection of individuals ...”. This replaces the concept of ‘qualified experts’, which was introduced in the 1996 Basic Safety Standards Directive (BSSD 1996).

2.2 The RPE needs to have their competences recognised by the competent authority and the Directives requires Member States to make arrangements for the recognition of RPEs.

- 2.3 The Directive lists tasks that operators must undertake to ensure protection of members of the public, where advice should be sought from the RPE.
- 2.4 The UK government has placed a legal obligation^{1,2,3} on the environment agencies to ensure that permit holders comply with these requirements. We comply with this obligation by placing appropriate conditions within our permits, including the requirement to consult with “Radioactive Waste Advisers”. Permit holders must comply with these permit conditions.
- 2.5 This document specifies our expectation of the role of the RWA and the role of the permit holder with particular emphasis on their responsibilities in relation to the RWA.
- 2.6 To simplify the description of the different legislation that applies to radioactive waste management in England and Wales and in Scotland and Northern Ireland, throughout this document we use the term “Radioactive Waste Legislation” (RWL). This term refers to the Environmental Permitting Regulations 2016 (as amended) (EPR 2016) and the Radioactive Substances Act 1993 (RSA93). Furthermore, any references to a “permit” means a permit issued under EPR 2016 for England and Wales, and/or a registration or authorisation issued under RSA93 in Scotland or Northern Ireland.

3 Radiation Protection Expert

- 3.1 In the United Kingdom the role of the RPE, as defined in the BSSD 2013, is fulfilled by two different roles specified in different legislation and regulated by different organisations. The environment agencies are responsible for implementing Directive requirement for RPEs to be involved in radioactive waste management and environmental radiation protection. We refer to these RPEs as Radioactive Waste Advisers (RWAs). Radiation Protection Advisers (RPAs) are RPEs who advise on occupational radiation protection.

¹ In England and Wales this is achieved through Part 3 of Schedule 23 of EPR16.

² In Northern Ireland this requirement is in the Radioactive Substances (Basic Safety Standards) (Northern Ireland) Regulations 2003

³ In Scotland this requirement is in the Environmental Authorisations (Scotland) Regulations 2018, Schedule 8 paragraph 20(d)

- 3.2 Article 82 of the directive specifies the range of topics on which the RPE is expected to provide advice. These topics are likely to include both environmental and occupational radiation protection. We only expect the RWA to provide advice on the aspects of the topic relevant to environmental radiation protection. We have highlighted the topics below where we expect the RWA to give this advice.

- (a) Optimisation and establishment of appropriate dose constraints;
- (b) plans for new installations and the acceptance into service of new or modified radiation sources in relation to any engineering controls, design features, safety features and warning devices relevant to radiation protection;
- (c) categorisation of controlled and supervised areas;
- (d) classification of workers;
- (e) workplace and individual monitoring programmes and related personal dosimetry;
- (f) appropriate radiation monitoring instrumentation;
- (g) quality assurance;
- (h) environmental monitoring programme;
- (i) arrangements for radioactive waste management;
- (j) arrangements for prevention of accidents and incidents;
- (k) preparedness and response in emergency exposure situations;
- (l) training and retraining programmes for exposed workers;
- (m) investigation and analysis of accidents and incidents and appropriate remedial actions;
- (n) employment conditions for pregnant and breastfeeding workers;
- (o) preparation of appropriate documentation such as prior risk assessments and written procedures;

4 Radioactive Waste Advisers

- 4.1 A RWA is an RPE specialising in radioactive waste management and environmental radiation protection, to ensure the optimal protection of members of the public
- 4.2 A RWA must be certified as being competent by an Assessing Body that is approved by the environment agencies.
- 4.3 A RWA's competency is assessed against the RWA syllabus specified by the environment agencies, but the RWA is not expected to be an expert in every topic that is specified on the syllabus.

- 4.4 The RWA syllabus has been designed so that a RWA will have sufficient knowledge of a wide range of issues relating to radioactive waste management and environmental radiation protection to enable them to provide a good standard of advice but just as importantly to know when further specialist advice is needed and where to seek such advice.
- 4.5 The RWA is not required to have specialist knowledge of issues relating to conventional (i.e. non-radioactive) waste management or conventional (i.e. non-radioactive) environmental protection, but we would expect them to be able to advise their employer that additional advice might need to be sought on these matters if appropriate.
- 4.6 The RWA can be an employee of the permit holder, an employee of a business related to the permit holder or an external consultant.

5 Roles and responsibilities of the permit holder

- 5.1 A prospective permit holder, or other person intending to accumulate or dispose of radioactive waste, should consult with an RWA before applying for a permit to determine whether a permit is required and to ensure that appropriate information is included in any application.
- 5.2 It is the responsibility of the permit holder to comply with the conditions of any permit issued under RWL. Where the permit allows for the accumulation, disposal or management of radioactive waste this will include a requirement to appoint and consult with suitable RWAs.
- 5.3 More than one RWA can be appointed. It is the responsibility of the permit holder to determine how many RWAs they need to appoint based on their business needs.
- 5.4 The permit holder only needs to appoint a suitable RWA if required by permit conditions. Some permits, such as those which allow the keeping and use of sealed radioactive sources do not require the appointment of an RWA. However, such a permit holder may find it useful to consult an RWA as they will be able to provide expert advice on the safe keeping of radioactive material and disposal of the material once it becomes waste.

- 5.5** The permit holder is responsible for ensuring that any RWA appointed is “suitable” to give advice on the permit holder’s business. Section 8 in this guidance provides guidance on the suitability of RWAs. Where the permit holder appoints more than one RWA, the different RWAs may be suitable to advise on different aspects of the permit holder’s business.
- 5.6** Unless a RWA is only being consulted for the purposes of paragraphs 5.1 or 5.4 of this guidance, the permit holder must appoint the RWA(s) in writing. The appointment should specify the scope of advice which the RWA is required to give. The scope of advice may be for particular locations or sites, specific knowledge areas or a combination of both.
- 5.7** Article 68 of BSSD 2013 states that the permit holder is required to consult an RWA on the following matters:
- a) achieving and maintaining an optimal level of protection of members of the public;
 - b) accepting into service adequate equipment and procedures for measuring and assessing exposure of members of the public and radioactive contamination of the environment;
 - c) checking the effectiveness and maintenance of equipment as referred to in point (b) and ensure the regular calibration of measuring instruments
- 5.8** The permit holder shall have due regard to the advice provided by the RWA.
- 5.9** The permit holder must ensure that their RWAs have access to all the information and facilities that they need to perform their role effectively.

6 Role of the Radioactive Waste Adviser

- 6.1** The role of the RWA is to provide advice to the permit holder on radioactive waste management and environmental radiation protection. Responsibility for compliance with RWL and permit conditions lies with the permit holder. The permit holder will specify

the scope of advice that a RWA is expected to give. It is likely to include the matters specified in Section 5.7 above.

- 6.2 There may be a difference between what we expect of an RWA and what is required by an employer as part of an individual's job specification. We have set out the minimum requirements for an individual to be an RWA; this does not prevent the permit holder requiring additional competences to assist in complying with permit conditions and providing wider advice and assistance, for example on conventional waste management, or acting as an RWA and RPA. We have no problems with such an approach, but we are clear that these additional responsibilities are separate from the requirements to be an RWA.
- 6.3 The RWA needs to understand the limitations of the advice that they are able to give and be able to recognise when further specialist advice is needed. The RWA should be able to clearly convey to the permit holder what additional specialist advice is needed and understand the resulting advice that is received.
- 6.4 Where a RWA recommends that additional advice is sought from a number of specialists, it is likely to be the role of the RWA to consolidate this advice into recommendations for his employer.
- 6.5 Where a RWA has been appointed on a continuing basis, they should usually be available to provide advice whenever required, although they do not need to be present on the permit holder's premises at all times.
- 6.6 As specified above the BSSD requires that permit holders achieve and maintain an optimal level of protection of the environment and members of the public. The primary mechanism that the environment agencies require the permit holder to comply with this requirement is by imposing BAT/BPM⁴ conditions. RWAs should therefore be able to provide advice on BAT/BPM.

⁴ Although the environment agencies use the different terms best available techniques (BAT) and best practicable means (BPM) we have stated that we consider that the requirements on the permit holder are the same.

7 What is a suitable RWA?

- 7.1 A suitable RWA is a RWA who has “the specific knowledge, experience and competence required for giving advice on the particular radioactive waste management and environmental radiation protection issues for which the permit holder is making the appointment.”

Suitable RWA	= RWA (certificate of competence)	+ Specific knowledge, experience and competence
What is required?	The RWA has demonstrated to an Assessing Body that he or she meets the environment agencies' competence requirements based on the RWA syllabus	The RWA has demonstrated to the permit holder that he or she has sufficient understanding, based on knowledge, experience and competence to give advice on that permit holder's business
Who sets the standard?	The environment agencies	The permit holder
Who has to be satisfied?	The Assessing Body	The permit holder
Proof?	Valid Certificate of Competence awarded in the last 5 years	The RWA's work history

- 7.2 To be suitable for a particular permit holder the RWA needs to demonstrate that they have gained knowledge, experience and competence in the same, or a similar, business to the permit holder's business so that the RWA can give relevant advice.

- 7.3 Permit holders that employ more than one RWA may decide to employ an individual who has been assessed as a competent RWA but who does not currently have the knowledge and experience to make them suitable for the permit holder's business. The permit

holder may develop the RWA so that they become suitable and only then will the RWA be appointed as a RWA for the permit holder.

- 7.4 To become suitable for a particular permit holder, a RWA may attend training courses and/or carry out work to gain experience specifically designed to make the RWA suitable for the permit holder's business.
- 7.5 A RWA who is suitable for one permit holder may not be suitable for another permit holder. This is no different to a permit holder choosing any other consultant to help his business based on the consultant's qualifications and CV, i.e. proven competence plus relevant history and experience.
- 7.6 The RWA can be an employee of the permit holder, an employee of a business related to the permit holder or an external consultant.
- 7.7 RWL and associated permits do not impose any duties specifically on the RWA; the permit holder has the legal duty to comply with the legislation and permit conditions.

8 Determining suitability of RWAs

- 8.1 Decisions on the suitability of a RWA are the responsibility of the permit holder. Permit holders must put in place arrangements to ensure that any RWAs they appoint are suitable and use these arrangements to determine the suitability of any RWA appointed.
- 8.2 As part of our inspection process we may scrutinise the arrangements in place for the permit holder to assess the suitability of the RWAs that the permit holder has appointed.
- 8.3 There are a number of factors that a permit holder needs to take into account when determining suitability. These include, but are not limited to, the RWA:
 - a. Having a current certificate of competence issued by an approved Assessing Body;
 - b. Demonstrating from their working history that they have appropriate experience of the permit holder's business in relation to radioactive waste management and environmental radiation protection. Whether this experience is appropriate

depends on the nature and length of the experience and how recent it is;

- c. Demonstrating that they have given advice commensurate with the level and scope of advice required by the permit holder; and
- d. Having communication skills that will allow the RWA to communicate effectively with the permit holder.

9 Corporate Radioactive Waste Advisers

9.1 The environment agencies recognise that there are some permit holders at nuclear sites that might want to implement their obligation for appointing RWAs on the site by sharing the duties amongst more than one individual. This may be for several reasons, such as the size and complexity of the site and the desire for resilience to allow for staff absences and turnover. Under these circumstances the group of individuals providing the RWA function will be known as a “Corporate RWA”.

9.2 In order to form a Corporate RWA, the permit holder must demonstrate, through approved “Corporate Arrangements”, that the group of individuals can collectively fulfil all the capabilities we expect of an individual RWA. In turn, this means that the permit holder must have sufficient infrastructure to identify, develop and maintain the knowledge and experience of individual members of the group.

9.3 If Corporate Arrangements are approved for a nuclear site, there is no requirement for the site to appoint individual RWAs unless it chooses to do so for its own business purposes.

9.4 Organisations with more than one nuclear site may choose to submit a single set of Corporate Arrangements. The corporate arrangements should specify which sites the arrangements apply to.

9.5 New permit holders or prospective permit holders (see paragraph 11.2) who wish to rely upon a corporate RWA must apply to the RWA Approval Board for approval of their Corporate Arrangements. Nuclear sites that currently rely upon individual RWAs may choose to use a Corporate RWA and make an application to have their arrangements approved.

10 How can organisations demonstrate their Corporate Arrangements?

- 10.1** The environment agencies expect the Corporate Arrangements to demonstrate how the collective group of individuals, or job roles, that make up the Corporate RWA fulfil all the constituent parts of the RWA syllabus and that systems and processes within the organisation provide a reasonable level of assurance that competent advice is provided to the permit holder.
- 10.2** The individuals that make up the Corporate RWA can be employees of the permit holder, external parties, including but not limited to, consultants (including other permit holders with common interests) or a mixture of both. If external parties are part of the Corporate RWA function to one permit holder, this does not preclude them from providing advice to other permit holders where workloads allow.
- 10.3** We will not prescribe any common competences for all individuals, or job roles, that make up a Corporate RWA. That is for the permit holder to determine.
- 10.4** The RWA Approval Board must approve the Corporate Arrangements. The permit holder is then responsible for implementing the Corporate Arrangements and assessing the competence and suitability of the individuals who make up the Corporate RWA.
- 10.5** Implementation of the Corporate Arrangements may be periodically inspected by the environment agencies' inspectors as part of the regulatory process to ensure that Corporate Arrangements remain fit for purpose and are being adequately implemented.
- 10.6** Figure 1 shows a summary process for approval and assessment of Corporate RWAs compared to approval of individual RWAs.

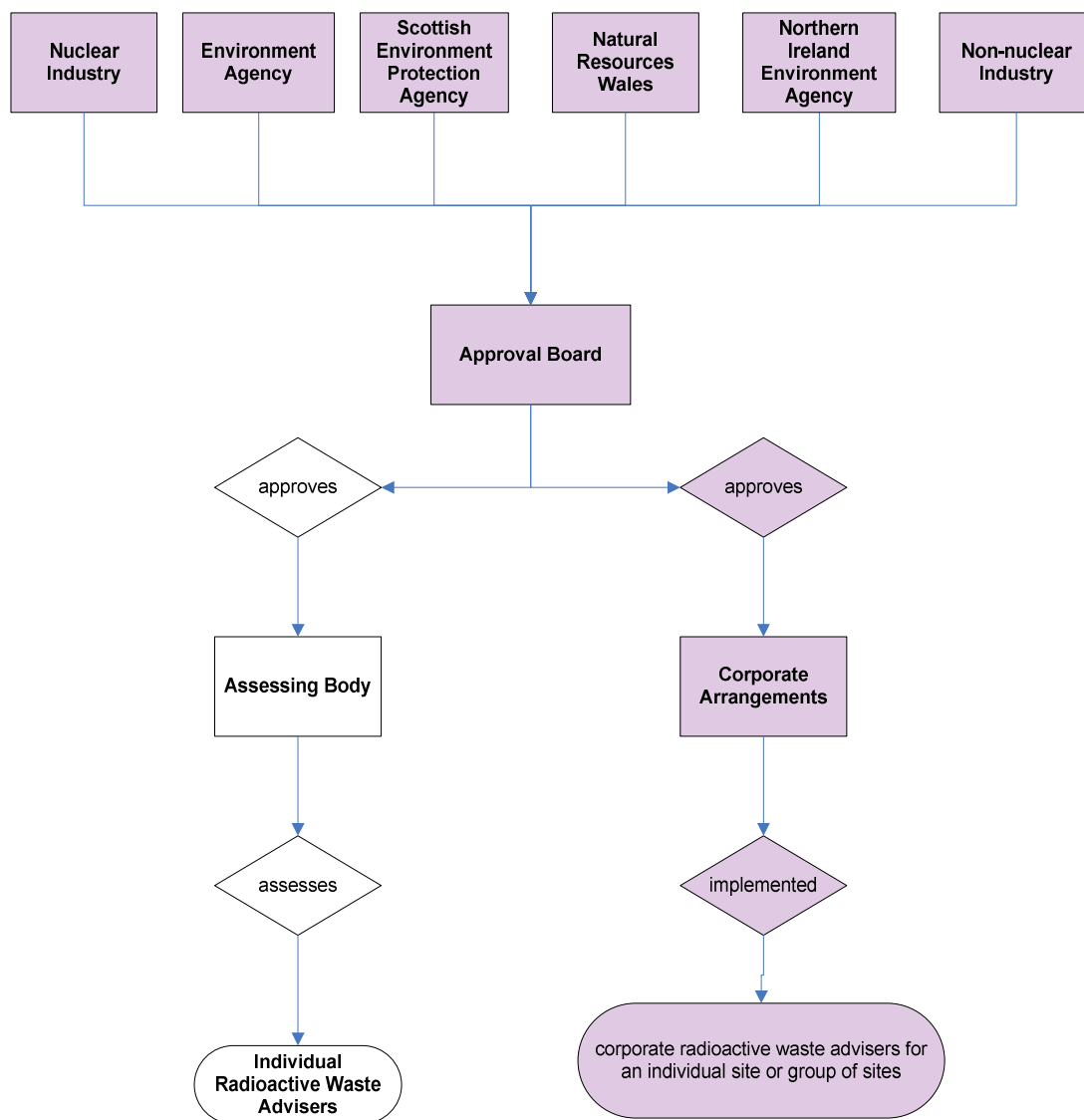


Figure 1: Summary of approval and assessment process for Corporate RWAs and individual RWAs

11 What information needs to be submitted to the Approval Board for recognition of Corporate Arrangements?

- 11.1** An Approval Board with membership from the environment agencies and industry has been set up to recognise Corporate Arrangements for nuclear permit holders.
- 11.2** Applications will be accepted from those who either already have a permit issued by the relevant environment agency, or who have applied for one so that the adequacy of Corporate Arrangements can be assessed during the application determination process. We also recognise that operators of new nuclear sites may wish to seek RWA advice on complex issues such as plant design prior to their permit application, so operators who have entered into a charging arrangement under Section 37 of the Environment Act 1995 may also apply to have their corporate arrangements approved.
- 11.3** Applications should be sent to RWA@sepa.org.uk and any questions on applications should also be sent to the RWA Secretariat at this email address.
- 11.4** The Approval Board requires permit holders applying for recognition of Corporate Arrangements to provide, as a minimum, the following information:
- a.** Details of the permit holder demonstrating how it is constituted as, or comprises an identifiable part of, a legal entity or partnership or other grouping that is capable of being recognised;
 - b.** Details of the arrangements the permit holder will use to identify, develop and maintain the competence of individuals within its organisation so that they can collectively fulfil the requirements of the Corporate RWA;
 - c.** Details of the permit holder's management procedures demonstrating how the individuals that collectively provide the Corporate RWA function will provide the required advice on radioactive waste management and environmental radiation protection, including justification that their number and knowledge range are sufficient for the complexity of the site and the range of permit requirements;

- d. Details of how the individuals that collectively provide the Corporate RWA function link together to provide coherent advice; and
- e. Details of the arrangements in place to ensure continuity of advice in the event that part of the Corporate RWA function is not available, e.g. because an individual leaves the employment of the organisation or is off work for any protracted period. Arrangements should also include arrangements for the continuity of advice in the event of restructuring of the nuclear organisation.

11.5 A form, which can be downloaded from the SEPA website, is used by the regulators to summarise how the applicant has met these essential requirements. Applicants may choose to complete the second column of this form as part of their application, but do not have to do so.

11.6 It is likely that some nuclear site permit holders will already have most of this information as most of it is required by existing permits. In this case it is acceptable to submit the existing documents with appropriate sections referenced or highlighted to the Approval Board. There is no need to re-write existing procedures just for submission to the Approval Board other than to show how existing procedures meet the syllabus requirements. This could be done by mapping the syllabus requirements to existing job roles with supporting procedures to demonstrate that suitably qualified and experienced personnel are recruited into these jobs.

12 Making an application for the approval of Corporate RWA arrangements

12.1 When the RWA secretariat receives an application they will carry out an initial check that all of the information is present and determine who the lead assessor will be. The application is then be forwarded to the lead assessor. This process will take a maximum of 6 weeks, and the applicant will be notified once it has been completed.

12.2 The lead regulator makes a detailed assessment of the application and recommends acceptance/rejection to the board. Within 6 weeks of receiving the application from the RWA secretariat the lead regulator will make an initial assessment and determine whether significant further information is required. They will discuss this with

the applicant and agree timescales for the full assessment. This may be subject to change, depending upon timeliness and quality of any further information required.

12.3 Once the lead regulator considers that the application is complete, the summary documents are forwarded to the secretariat for review at the next Approval Board meeting. The RWA secretariat will ensure that nuclear regulators are informed to the timings of the Approval Board meetings

12.4 The applicant and lead regulator are invited to join the Approval Board, usually by telephone, to give a brief summary of their application and answer questions.

12.5 The Approval Board's decision is communicated via a letter to the site contact from the current chair.

12.6 Any appeals on decisions made by the Approval Board should be made in the first instance to the Approval Board Secretariat in writing. If the applicant is not satisfied after the Secretariat's review, the appeal will be taken to the Approval Board.

If the applicant considers that the performance of the lead regulator making the detailed assessment is unsatisfactory the initial redress is via that Agency's complaints procedure.

12.7 Applicants will be charged for time and materials in determining the application for Corporate RWA, in line with the relevant Agency's normal arrangements.

12.8 Any information that we receive relating to applications for Corporate RWAs will be handled in accordance with our Privacy Policies that can be found on our websites.

13 What is expected of a permit holder whose Corporate Arrangements have been approved?

13.1 Corporate arrangements are not subject to periodic review by the RWA approval board, but as explained in 10.5 will be inspected by regulators as part of their routine compliance activities.

13.2 The Approval Board should be notified if the permit holder intends to introduce new procedures, or amend any existing procedures that will

change the management system or organisational arrangements and might reasonably be seen to have a significant impact on the approved Corporate Arrangements. The Approval Board can assess and where appropriate, approve the changes. A summary of the proposed changes should be given to the RWA Secretariat at RWA@sepa.org.uk.

- 13.3 Informal discussion with the site regulator prior to submission is encouraged.
- 13.4 The process in section 12 above will be followed and the same timescales will apply.
- 13.5 If these changes mean that the Corporate Arrangements are no longer adequate to meet the Approval Board's requirements, then the Approval Board may remove the permit holder's recognition of Corporate Arrangements
- 13.6 The permit holder is expected to provide the Approval Board with copies of its current relevant procedures and any other relevant documents relating to its Corporate Arrangements if requested.

14 Suitability

- 14.1 It will be the permit holder's responsibility to demonstrate the suitability of the Corporate RWA (see guidance on suitability of individual RWAs above).

15 Examples of how a nuclear site might satisfy the requirement for RWAs

- 15.1 There are several ways in which a nuclear permit holder might choose to satisfy the environmental regulators' requirements for appointing RWAs. This section aims to explain the different methods.

Individual RWAs

- 15.2 Individual RWAs:
 - Must demonstrate competence in all parts of the RWA syllabus;
 - Have their competence recognised by an Assessing Body that has been approved by the environment agencies;

- Must be suitable to advise the permit holder on its business;
- Do not have to be located on the nuclear site; and
- Have a way of working that can be compared to a General Practitioner (GP) in medicine where the RWA/GP has a broad knowledge of a wide range of topics but seeks specialist advice when needed. Importantly the RWA/GP has sufficient knowledge and experience to be an “intelligent customer” and understand the implications of specialist advice and what actions might need to be taken as a result of this advice.

15.3 For large nuclear sites it is unlikely that a single individual RWA will be sufficient to provide the necessary advice on radioactive waste management and environmental radiation protection for the whole site, but individual RWAs may be appointed to provide advice to particular buildings, processes or areas of site. This does not mean that the site has a Corporate RWA; instead it has several individual RWAs usually with differing specialist areas.

15.4 For smaller nuclear sites or those in care and maintenance, a single individual RWA may be sufficient to provide the necessary advice on radioactive waste management and environmental radiation protection. It is for the permit holder to decide what is sufficient.

15.5 The balance between the number of individual RWAs located on the nuclear site and those located elsewhere is for the permit holder to decide based on its business needs.

15.6 Having individual RWAs does not prevent the permit holder seeking additional advice from others, e.g. company experts on a particular topic, or external consultants.

OR

Corporate Arrangements

15.7 Corporate Arrangements:

- Link together individuals who have competence in part of the RWA syllabus (but not all of it) to form a Corporate RWA that collectively has competence in all parts of the RWA syllabus and responsibility for provision of advice on radioactive waste management and environmental radiation protection across all parts of the RWA syllabus;

- Are assessed by the RWA Approval Board for a particular site and if approved allow the nuclear site to operate with a Corporate RWA;
- Must ensure that the Corporate RWA is suitable to advise the permit holder on its business; and
- Must be written specifically for the permit-holder, although arrangements for tenants can be similar to those used by the site licensee, and not all members of the corporate RWA have to be located on the permit-holder's premises.

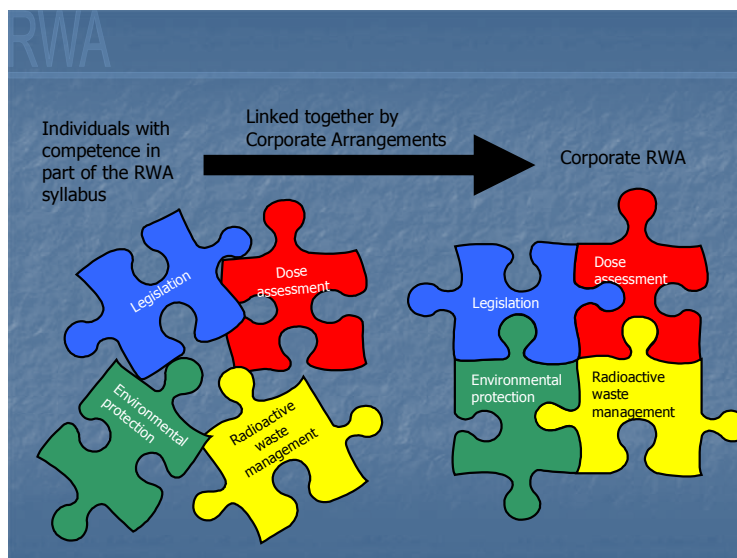


Figure 3: How Corporate Arrangements link individuals to form a Corporate RWA

- 15.8** The number of individuals making up the Corporate RWA is for the nuclear permit holder to decide, based upon the complexity of the site, the degree of resilience needed in key areas, and the range of competences of the individuals forming the Corporate RWA.
- 15.9** Corporate Arrangements may specify the individuals that form the Corporate RWA by name or by job role. However, if individuals are named, notification and re-approval may be needed each time an individual making up the Corporate RWA changes job.
- 15.10** Corporate Arrangements should explain who is responsible for providing advice on the different parts of the syllabus and the management arrangements that will ensure individuals forming the Corporate RWA will communicate effectively to ensure that coherent advice is given.

- 15.11 It is advisable to map the different RWA syllabus topics to individuals who have competence in that particular topic to demonstrate that the Corporate RWA is competent in all parts of the RWA syllabus.
- 15.12 The balance between the number of individuals forming the Corporate RWA located on the nuclear site and those located elsewhere is for the permit holder to decide based on its business needs.
- 15.13 Having a Corporate RWAs does not prevent the permit holder seeking additional advice from others, e.g. company experts on a particular topic or external consultants.

16 Further information

- 16.1 If you require any specific information on RWAs and Corporate Arrangements that is not included in this guidance please see the *Questions and Answers* section of the website (http://www.sepa.org.uk/radioactive_substances/radioactive_waste_advisers/questions_and_answers.aspx) or contact us at RWA@sepa.org.uk.