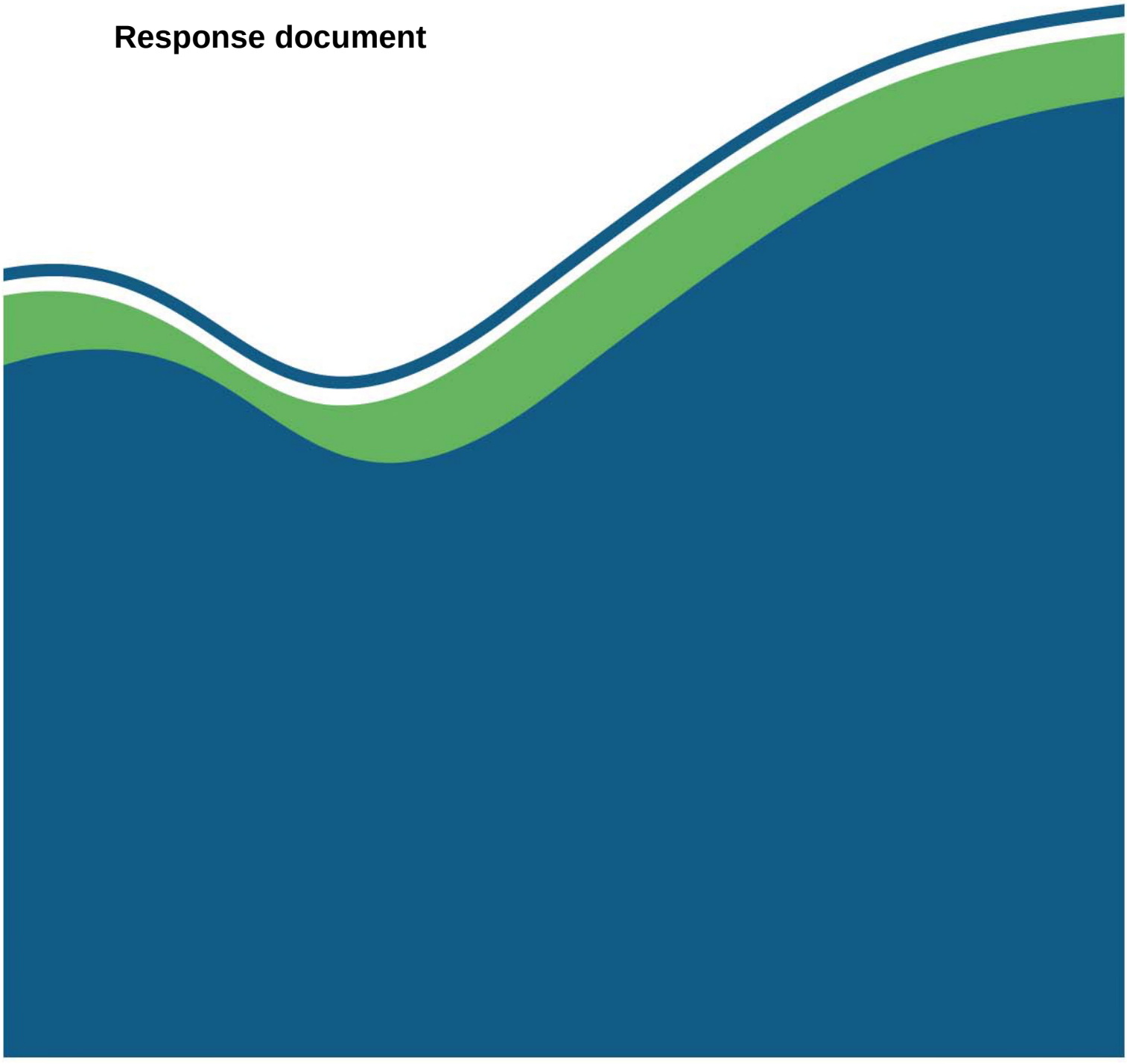
Scottish Environment Protection Agency
Buidheann Dion Àrainneachd na h-Alba

Environmental Authorisations (Scotland) Regulations 2018

Consultation on draft standard conditions for radioactive substances authorisations

Response document



Executive summary

The Scottish Environment Protection Agency (SEPA) published a consultation on draft standard conditions that will be used in registrations and permits for radioactive substances activities granted under the Environmental Authorisations (Scotland) Regulations 2018. This response document outlines the consultation process and gives our response to specific comments made by respondents.

Contents

1 Introduction

1.1 The Environmental Authorisations (Scotland) Regulations 2018 (EASR) set out the procedure that SEPA must follow in making and revising standard conditions. Part of this procedure is to consult those people that we consider appropriate and that can happen before EASR comes in to force.

1.2 To meet this requirement we published a 12-week consultation on 26 March 2018 on draft standard conditions for radioactive substances authorisations[1].

1.3 In accordance with good practice and the process in our public participation statement, we involved stakeholders in the development of the standard conditions before we formally consulted on them. This included keeping our routine industry liaison groups, the Scottish Non-Nuclear Industries Liaison Group (SNNILG) and Nuclear Industries Liaison Group (NILG), up to date with development of the better environmental regulation programme and specifically with the development of the standard conditions.

1.4 Additionally, a draft of the standard conditions was presented to stakeholders at the Integrated Authorisation Framework consultation workshop that we held for those interested in radioactive substances activities in November 2017. Following feedback from these events, we undertook a number of workshops with the nuclear, medical and oil and gas sectors to look at the draft standard conditions in detail during January 2018. The feedback from these events was supportive and industry welcomed our proposed standard conditions. Various detailed points were raised with us, which we addressed whilst preparing the standard conditions that we consulted on.

1.5 We also met with the Office for Nuclear Regulation (ONR) and the Environment Agency (EA) to discuss our proposed standard conditions and although they did not submit a formal response to the consultation we took their views into account in producing the published standard conditions.

1.6 This report describes how we have dealt with the responses we received from the formal consultation.

2 Background

2.1 As part of the Better Environmental Regulation Programme, the Scottish Government and the Scottish Environment Protection Agency (SEPA) are working together to develop an integrated authorisation framework. The aim of the framework is to integrate the authorisation, procedural and enforcement arrangements relating to water, waste management, radioactive substances and pollution prevention and control. The integrated authorisation framework is

[1] Consultation on draft standard conditions for radioactive substances authorisations, SEPA, March 2018 (https://consultation.sepa.org.uk/radioactive-substances-unit/consultation-on-draft-standard-conditions-for-radi/consult_view/)

being developed in a phased manner, starting with radioactive substances; the other regulatory regimes will be added in due course.

2.2 A key part of developing the integrated authorisation framework is the introduction of new regulations, the Environmental Authorisations (Scotland) Regulations 2018 (EASR), which were made at the end of June and came in to force on 1 September 2018.

2.3 Under EASR, we need to make standard conditions that will be used in registrations and permits. Standard conditions are conditions that have been predetermined by us in advance of receiving any application. They may be specific to a certain type of regulated activity or could apply to all regulated activities. This is in contrast to bespoke conditions, which are developed on a case-by-case basis taking into account the specific information that is included in an application for a permit. Registrations can only have standard conditions.

2.4 The principal objective of the consultation was to seek views on the proposed standard conditions for radioactive substances activities. Views were sought on both the technical content and the presentation including style of language used. The consultation was targeted at people who were regulated under the Radioactive Substances Act 1993 or who may carry out a radioactive substances activity in the future. We also welcomed views from anyone that has an interest in radioactive substances regulation, for example, other regulators and interested members of the public.

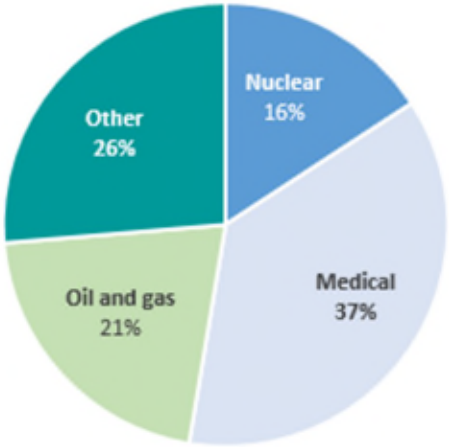
2.5 As part of implementing EASR, we took the opportunity to review certain aspects of our regulation of radioactive substances. Consequently, a number of changes were proposed in the consultation that will be implemented by using standard conditions. We also sought views on these changes in approach.

2.6 We asked four general questions on our approach to standard conditions and eight technical questions on specific standard conditions.

3 Responses

3.1 We received 19 responses from a range of stakeholders including the nuclear, medical, oil and gas sectors as well as from other government agencies and representatives of the public.

Figure 1 – Respondents by sector



3.2 The responses were broadly supportive of our proposals. Our detailed responses to comments made are given in the appendix to this report and a summary of the response for each question is given below based on those that gave a positive or negative answer.

Question 1 – Do you foresee any problems or issues with our planned approach to refer to standard conditions rather than reproduce them in full in every registration and permit?
100% did not foresee any problems.

Question 2 – Do you have any comments on our draft guidance?
Not suitable for a yes or no answer.

Question 3 – Do you foresee any problems in using and complying with the standard conditions?
85% did not foresee any problems. Some problems were foreseen in complying with different standard conditions but no particular standard conditions was identified as being difficult to comply with.

Question 4 – Do you foresee any problems with the proposed approach to regulating contaminated items on authorised premises?
70% did not foresee any problems. Some problems were foreseen in the labelling of contaminated items in the medical and oil and gas sectors.

Question 5 – Do you foresee any problems with the proposed changes to the regulation of radioactive waste transfers?
90% did not foresee any problems. A problem was foreseen in characterising waste such as activated components so it will be difficult to provide an accurate record.

Question 6 – Do you agree with the proposed changes to how we limit holdings of sealed sources in Categories 3 and 4?
90% agreed with the proposed changes. No reason was given for why this might be a problem.

Question 7 – Do you agree with the proposal to refer to compliance with the standards set out in the document "Security Requirements for Radioactive Sources"?
100% agreed with the proposal.

Question 8 – Do you foresee any problems with the proposal to treat these activities in the same way as an authorisation for radioactive waste?
85% did not foresee any problems. A problem was foreseen in why this is needed, what will be required and how consistency in regulation will be assured.

Question 9 – Do you foresee any issues with the proposed changes to radioactive discharges outwith authorised outlets?
100% did not foresee any problems.

Question 10 – Do you agree with the removal of the requirement to provide three-yearly assessments of the dose to non-human species?
100% agreed with this proposal.

Question 11 – Do you foresee any problems with the requirement to prepare, maintain and implement a waste management plan?
100% did not foresee any problems.

Question 12 – Do you have any other comments on the standard conditions and guidance?
Not suitable for a yes or no answer.

4 Appendix – Responses to specific comments made by respondents

Comments made by respondents are listed in the table below with our response in the shaded box under the comment.

Question 1 – Do you foresee any problems or issues with our planned approach to refer to Standard Conditions rather than reproduce them in full?
Purely dependent on the standard conditions themselves. In principle there are no objections.
No, as long as they are easy to find. The registration/permit must include a short, easy to type URL that takes you straight to the conditions, not just vague guidance to see the SEPA website. Maybe even include a means of requesting a copy to be sent by post.
Information on where to find standard conditions will be sent with permits and registrations. It is a requirement to notify all affected people when the standard conditions are changed. At this time, we will clearly explain the changes and give clear information on how to access the latest standard conditions.
No issues except the timeframe for responding to the changes required by a new permit e.g. implications for the site management system, and then the time to respond to changes in the published Standard Conditions when notified. We assume that the Letter from SEPA informing us of changes to Standard Conditions will be sent to the Company Secretary. It is presumed that individual Standard Conditions may be referred to or dis-applied as necessary. We would appreciate clarity on how SEPA foresee this happening. Further, we would like to understand how bespoke conditions will interact with Standard Conditions. For example, Condition 2.5.2 in the current D3100 LLWF authorisation states that 'The Authorisation Holder shall dispose of accumulated radioactive waste as soon as it is practicable to do so and in any event within 24 hours of receipt' and the proposed Standard Condition B.8.3 states 'You must transfer or dispose of radioactive waste as soon as reasonably practicable after it has become waste'. As the current condition places extra time constraints on the activity, it is anticipated that this may be included in the revised authorisation as a bespoke condition. In such circumstances will Standard Condition B.8.3 be dis-applied or will the bespoke condition over-ride Standard Condition B.8.3?
Changes to standard conditions, other than administrative changes, come into force 3 months after they have been published. It should be borne in mind that prior to any standard condition being made or amended there will be an appropriate consultation which provides the opportunity for affected person to raise any concerns about implementation times. We will always send notification of changes to standard conditions to the authorised person, but upon request, we can also send copies to other relevant persons. It is not out intention to apply or dis-apply individual conditions. Rather we will apply the groups of conditions as explained in the consultation and demonstrated in the annex 2 example permits. Bespoke conditions override standard conditions as set out in regulation 23(6) of EASR. We would expect that bespoke conditions are supported by a reason and guidance just like standard conditions. This will allow the relationship with relevant standard conditions to be explained.
We generally support the new approach but do have some concerns about how version control will work in practice. SEPA should explain how it will identify versions of the Standard Conditions so that the most up to date version can be identified by operators. We would also like more information as

to how SEPA intends to inform operators of changes to the Standard Conditions, and would like to know if there will be formal notifications, or if operators will be required to actively look for updates on SEPA's website.
The current version of standard conditions will always be published on SEPA's website and the version number will be on the front page of the standard conditions. Before we make any changes to standard conditions we have to follow the procedure set out in the Environmental Authorisations (Scotland) Regulations 2018; this requires us to consult such persons as we consider appropriate before making the change and then to inform any person who is affected by the change when they are published. There will be a period of three months from publication before the revised condition take effect.
No, from our perspective it looks as though SEPA has covered all the bases and there should be no problems.
This seems like a logical process to prevent discrepancies. There would need to be a clear communication policy to let users know of any updates to Standard conditions. SEPA will need to ensure the website holding the standard conditions is very secure and is sufficiently robust to ensure it is always available for permit holders to access, even during maintenance etc.
Before we make any changes to standard conditions we have to follow the procedure set out in the Environmental Authorisations (Scotland) Regulations 2018; this requires us to consult such persons as we consider appropriate before making the change and then to inform any person who is affected by the change when they are published. There will be a period of three months from publication before the revised condition take effect. We will recommend that authorised persons save an electronic copy of the standard conditions or print out a copy to keep so that they have access to them at all times.
Magnox does not foresee any problems or issues with the planned approach of referring to Standard Conditions.
I believe this approach is an improvement. SEPA will need to ensure the website holding the standard conditions is very secure and is sufficiently robust to ensure it is always available for permit holders to access, even during maintenance etc.
We will recommend that authorised persons save an electronic copy of the standard conditions or print out a copy to keep so that they have access to them at all times.
I fully support this planned approach.
No, it's a sensible approach and will save time and effort if they require amendments in future.

Question 2 – Do you have any comments on our draft guidance?	
General	The guidance is in plain English and laid out well for every section. Some of the definitions of terms are differently worded for various regulatory regimes and it would be helpful to have a definitive statement of what will be applied when all the regimes are unified in one permit: Authorised Person, small quantities, radioactive

	substances, radioactive waste, radioactive material, fugitive emissions, adventitious release, container, transfer, waste management plan, contaminated items etc.
	We have reviewed the definitions and included those that have a specific meaning in the interpretation of terms in the standard conditions. Any terms not defined have their normal dictionary meaning.
General	EDF Energy welcomes this guidance and finds the format to be helpful; however, we are not clear as to the obligations that it places upon operators. We would appreciate clarification from SEPA as to whether the guidance is meant to be a starting point from where operators can develop their position, or a minimum requirement for operators to meet.
	The guidance is intended to be helpful to operators in determining how they can comply with the standard conditions. It is intended to be starting point rather than a minimum requirement for all authorised persons to meet as it does not address all kinds of radioactive substances activities and all specific situations that may be encountered. However, where it does provide guidance that is relevant to the circumstances being considered we expect that if it is not being followed the reasons for this can be explained and compliance measures that are of at least an equivalent standard are in place.
General	No, it looks well thought out, comprehensive and effectively covers all aspects.
General	In general the format and content of the guidance is good; there is a useful level of detail which clarifies many issues.
General	Magnox considers the draft guidance is helpful.
General	In general the format and content of the guidance is good; there is a useful level of detail which clarifies many issues.
General	The guidance is very helpful.
General	Useful work in progress which should develop over time as suggested. It is not stated whether SEPA inspectors will expect full compliance with this general guidance. It would be helpful to have more detail to make it clear the minimum that SEPA expects to be in place when assessing compliance.
	The guidance is intended to be helpful to operators in determining how they can comply with the standard conditions. It is intended to be starting point rather than a minimum requirement for all authorised persons to meet as it does not address all kinds of radioactive substances activities and all specific situations that may be encountered. However, where it does provide guidance that is relevant to the circumstances being considered we expect that if it is not being followed the reasons for this can be explained and compliance measures that are of at least an equivalent standard are in place.
General	None
General	We welcome the explanation of the reasoning behind and basis for each condition, as this will assist authorised persons and regulatory inspectors to assess the proportionality of any compliance arrangements made in response to the condition. We would hope that this is the intent of the guidance, and that the approach in practice by inspectors will be as outlined in the consultation document at section 2.5.
General	Guidance seems reasonable, and easy to understand.

General	The guidance seems clear and written in laymen's terms, we have one comment on Guidance note G.3, this is addressed in detail in the response to question 12
A.1	Resources. This is open to subjective interpretation by inspectors and could be affected by goal-post shifting. Both possibilities could leave a permit holder not knowing what is expected. Clear guidance should be provided on what would be acceptable.
	The guidance is intended to be helpful to operators in determining how they can comply with the standard conditions. It is intended to be starting point rather than a minimum requirement for all authorised persons to meet as it does not address all kinds of radioactive substances activities and all specific situations that may be encountered. However, where it does provide guidance that is relevant to the circumstances being considered we expect that if it is not being followed the reasons for this can be explained and compliance measures that are of at least an equivalent standard are in place.
A.2	Management arrangements. If these arrangements mean that a SEPA inspector wishes to see a wider range of duty holders present during an inspection this will need to be arranged well in advance.
	There is no intention to change who we need present at inspection from who we currently speak to.
A.2.2	A.2.2: the guidance states that "the frequency of the review or audit… should reflect the complexity of the radioactive substances activities undertaken". We believe that the more relevant concern should be the rate of change of the activities under taken, rather than the complexity of their nature. A complex, but mature, management system should require a less frequent audit than a new, but simpler, one.
	This has been incorporated into the published guidance.
A.4.1	A.4.1: companies holding personal data are required to comply with the EU's new General Data Protection Regulations. We believe that SEPA should state whether or not these requirements have been considered in producing this condition.
	We expect any companies holding personal data to do so in accordance with GDPR, the Data Protection Act 2018 and the company's own privacy policy. There is nothing in the standard condition requirement to suggest that anything to the contrary is needed.
A.5	Training. The guidance here is insufficient. If SEPA expect training matrices to be provided they should be prescriptive in terms of what is required. This guidance could leave duty holders interpreting the requirements differently which would lead to variation across Scotland resulting in an inspector finding one site compliant and expecting all others to match it or find themselves receiving a poor compliance report.
	The standard conditions are generally goal-setting rather than prescriptive so we do not specify that a training matrix is provided, it is up to the authorised person to decide who needs what training and experience. Where appropriate we may update the guidance to give examples of good practice or to refer to industry-developed guidance. Concerns over consistency can be addressed through sector guidance and groups such as the Scottish Non-Nuclear Industries Liaison Group (SNNILG).
A.6.3	The guidance reads "it is essential that the measuring instruments are calibrated against the radionuclides present in the radioactive substances being used of disposed of". The purpose of annual calibration of hand held contamination/dose rate meters is to confirm that the instrument is working in the same way as it was when purchased. It is the data in the manufacturer type test report/instrument specification that is used to identify that the instrument is fit for purpose. Calibration has to be carried out against

	traceable standard sources. These are limited and do not include the radionuclides being measured on many, if not most, occasions. Similarly, gamma ray spectrometry systems are calibrated using a range of radionuclide standards covering all the gamma photon energies which it is wanted to be covered. These are again of a traceable activity and allow calibration curves covering the full range of gamma energies being measured to be constructed and the efficiency of counting at that photon energy to be established. This data is then used in the spectral analysis package associated with the spectrometer to say which gamma emitting radionuclides are present and either specific activity. Again, suitable standards for many of the gamma emitters being analysed, do not exist. Calibration against standards of the radionuclides present in the waste is not an option in many, if not most situations and is not necessary.
	This has been incorporated into the published guidance.
A.6.3	A formal calibration against every radioisotope anyone could come across It's no feasible. I normally recommend annual calibrations against traceable standards and performing regular checks against a known check source. What is important is that people make sure their equipment has a suitable energy range, detection efficiency etc to cover what they're measuring, but that can be done from the tech specs.
	This has been incorporated into the published guidance.
A.6.3	Condition A.6.3 states that states that it is essential that measuring instruments are calibrated using the radionuclides present in the radioactive substance being used or disposed of. This is not the case for hand held contamination meters which are purchased with the energies they are intended to measure taken into account. These meters then undergo periodic tests to confirm the instrument is in the same condition as when it was manufactured. Also, Germanium Radiation Detectors measure X-rays from a few hundred electron volts up to gamma rays in 10 mega electron volts and above. These instruments are calibrated using traceable reference standards which allow us to measure any radionuclide which has an energy within the chosen calibration curve.
	This has been incorporated into the published guidance.
A.7	Sampling, measurements, tests, surveys and calculations. If measurements are required this would have significant resource implications for hospitals; at present compliance is demonstrated via calculation.
	This standard condition only requires the authorised person to make an assessment of the best way to determine compliance and includes calculation as an option. There is no requirement for sampling, measurements, tests or surveys to be carried out if they are not identified as necessary.
A.7.1	A.7.1: the drafting of this SC appears to increase the scope of the role of Radioactive Waste Advisors. Whereas the RWA currently only provides advice, the new drafting suggests that the RWA (along with the operator) will also be responsible for compliance. This contradicts SEPA's own guidance on the role of RWAs, and we ask that SEPA clarify its intention. If it is the intention to widen the RWA role then we would expect further justification and engagement.
	We have amended the guidance to make it clear that the RWA's involvement is an expectation for the management of radioactive waste. This is in keeping with Article 82 of the 2013 Basic Safety Standards Directive which lists the scope of advice that a radiation

	protection expert is expected to cover and includes “arrangements for radioactive waste management”. The RWA scheme is currently being revised to reflect the list in Article 82.
A.7.2	A.7.2: as described in response to A.7.1, we believe that SEPA should clarify its intentions with regard to the role of RWAs. We understand that RWAs only advise operators, and responsibility for actions taken ultimately lies with the operator.
	We have amended the guidance to make it clear that we expect the RWA to have advised on the assessment.
A.9.1	A.9.1: we believe that clarification is required to ensure that the notification requirements are clear and unambiguous. In conditions where it is not clear if a non-compliance might occur, and subsequently this does not occur, we believe that it would be unfair and disproportionate for SEPA to attempt to penalise an operator based on their interpretation of the likelihood of a non-compliance occurring. In any case, we believe that the use of A.9.1 should be subject to a test of reasonableness.
	All conditions are subject to a reasonable test by SEPA. This is an existing authorisation condition under RSA93 for both nuclear and non-nuclear activities. The BSSD requires that “significant” events are reported to the regulator, without defining “significant”. Depending on the event, SEPA may need to take action to reduce or minimise any public exposure. Instead of trying to define this, we have stated that all such events must be reported to us.
A.9.2	A.9.2: Notwithstanding the general need for clarification in the Standard Conditions about over the requirements for notification (which we have covered elsewhere), the guidance states that written notification ‘may’ be made by email. We would ask for clarification as to what is meant by ‘may’ in the guidance. If it is the expectation that the written confirmation is given by email then this should be written as ‘should’ or ‘shall’ etc. If however this is just a preferred method and SEPA would also accept other written forms e.g. by post or fax then this should be made clear in the guidance.
	The guidance has been amended to make it clear that written confirmation can be provided by different means but that we recommend email for speed.
B.1	Requirements. An explicit link to the ‘satisfying the ALARA requirements and the role of Best Practicable Means’ document should be provided. Google returned results for different versions of the document. Also, should the approach not be ALARP rather than ALARA? The distinction is important.
	The approach is ALARA as specified in the Environmental Authorisations (Scotland) Regulations 2018 schedule 8 paragraph 3 on interpretation; this is the same as under RSA93. We are considering the most efficient way to reference documents to ensure that the most recent versions are always referred to and easily accessible.
B.2	Optimisation. As per B1, an explicit link to the intended document should be provided as version control.
	We did consider the use of hyperlinks during development of the standard conditions; however, ensuring that all the links continue to work at all times was felt to be an administrative burden that could not be supported.
B.5.4	EDF Energy is concerned that the Standard Condition B.5.4 requires operators of Nuclear Licensed Sites to unnecessarily increase the handling of radioactive waste which is inconsistent with the principles of keeping radiation doses As Low As Reasonably Practicable ALARP and does not recognise existing arrangements for controlling such wastes on nuclear sites. This condition appears to be more suited towards radioactive materials on non-nuclear sites than radioactive wastes on nuclear sites. We ask SEPA to reconsider the broad

	application of this condition to nuclear sites. If this is not possible then, at the very least we ask SEPA to revise the guidance to exclude its application to nuclear sites.
	This has been incorporated into the published guidance.
B.5.5	Someone has evidently thought about oil/gas NORM here, but additional clarification is required. I would hope labelling of NORM contaminated equipment is only required once it has been removed from the operational system. Otherwise vast swathes of operational pipework will have to be labelled. NORM only becomes a problem once the containment is broken.
	This has been incorporated into the published guidance.
B.5.5	This guidance does not recognise arrangements in place at Nuclear Licenced Sites where controlled areas are used for controlling radioactive substances. This is considered to be best practice in the Nuclear Industry, and allows for the effective control of a large number of radioactive substances with a single management system. We believe that the guidance should recognise best practices in the Nuclear Industry, and should acknowledge that it is not reasonably practicable (or necessary) to mark all radioactive substances in a controlled area.
	This has been incorporated into the published guidance.
B.5.5	Management. Hospitals will need to be explicitly authorised to release radioactive materials in organisms.
	Yes, this will be included in any new permits by applying standard condition set I.
B.8.1	This guidance is ambiguous, and may suggest to some that operators should hold radioactive material above the limits set out in their permits. We recommend that the guidance be reworded to state that "'In addition to the requirement to comply with limits in your permit, you are also required to minimise the amount of material you hold i.e. no more than is necessary to carry out your activity".
	This has been incorporated into the published guidance.
B.8.1	Last sentence needs re-written as it appears to suggest that permit holders should or can exceed the limits in their permits ("...requires you to hold the minimum over and above these limits")
	This has been re-written in the published guidance.
B.8.1	Last sentence needs re-written as it appears to suggest that permit holders should or can exceed the limits in their permits ("...requires you to hold the minimum over and above these limits"
	This has been re-written in the published guidance.
B.8.1	Should be re-worded for clarity: "...the minimum over and above these limits" has caused some confusion. " ...the minimum quantity of radioactive material required, regardless of the limits set out in your permit" would be better.
	This has been re-written in the published guidance.
B.8.3	We are concerned that this guidance does not mention Best Practicable Means (BPM) in when referring to the management of radioactive waste. We agree that there are economies of scale in accumulating waste in order to justify the costs of uplift and disposal,

	but also believe that it is necessary for the guidance to acknowledge that in some cases, the accumulation of waste prior to uplift and disposal is considered to be BPM.
	This has been incorporated into the published guidance.
B.9	Waste management plan. If there is no guidance on a waste management plan the approach may not be consistent across sites in Scotland and the expectation may vary between SEPA inspectors. An example plan would be very useful.
	The content of a waste management plan will vary widely depending on the radioactive substances activities being carried out; for sealed sources it may be a simple description of how the sources will be disposed of and how this will be financed, whereas for a nuclear site it is likely to be an extensive document detailing the different waste streams. This means that waste management plans will vary in their content and detail; it is perhaps an area where different sectors could produce their own guidance and templates. Concerns over consistency can be addressed through sector guidance and groups such as the Scottish Non-Nuclear Industries Liaison Group (SNNILG).
C.2.4	Clarity on "as soon as reasonably practicable" is needed. The current guidance is vague ("reasonable time", "significant delay"). An actual figure for the acceptable timescale in which to receive confirmation would be useful, eg "within 24 hours of receipt".
	This is not a new requirement, we currently use the term “as soon as reasonably practicable” to allow flexibility.
C.2.4	Clarity on "as soon as reasonably practicable" is needed. The current guidance is vague ("reasonable time", "significant delay"). An actual figure for the acceptable timescale in which to receive confirmation would be useful, eg "within 24 hours of receipt". Would be useful to clarify that written confirmation can be by email.
	This is not a new requirement, we currently use the term “as soon as reasonably practicable” to allow flexibility. There is nothing to stop this being by email as the regulations (EASR regulation 2(2)) say that writing includes reference to electronic communication.
C.7.2	I’ve been dealing with this situation recently and this needs to be much clearer. Is this saying a lab can receive samples without a permit/registration in place?
	No. It is saying that samples can be **returned** (i.e. received) to the authorised place. Any other laboratory analysing the samples would still an appropriate authorisation for managing the samples.
F.1.1	Literally continuous supervision? I hope there is room for some flexibility here. What if the source was locked away in a secure room and the key was under continual supervision.
	Presumably if the source was locked away it is in storage or transit and this condition and associated guidance is for when a source is “not in storage or in transit” when it is reasonable to require continuous supervision.
G.3	Re: Guidance G.3 Disposal in normal refuse (dustbin disposal). The guidance refers to the fact that the assessment is based upon the co-disposal of non-radioactive waste, radioactive waste and non-radioactive waste (in sequential order of processing, to ensure dilution via co-disposal). However, the guidance also states that the Waste Receiver may be unaware of their receipt of radioactive waste, and that conditions are applied to the Waste Producer and not the Waste Receiver – does that mean that the Waste Producer is expected to co-consign radioactive and non-radioactive wastes, to ensure adequate dilution by co-disposal, also what mass / volume ratio would be considered necessary?

	Alternatively, there would appear to be a requirement for the Waste Producer to notify the Waste Receiver, to ensure adequate co-disposal, which could cause subsequent problems associated with acceptance of the waste (due to, for example, perception issues), and which could restrict / limit the Waste Producer's disposal options.
	The responsibility for co-disposal lies with the authorised person as described in condition G.3.1(b) that puts activity limits per $0.1m^3$ on disposal using this route.
G.3.1	This guidance references "Standard Rule 4.5.2", but does not make it clear where this standard rule can be found.
	This has been removed from the published guidance.
G.3.1	Disposal. The disposal of low level, solid metallic radioactive waste is an issue that could result in disproportionate charges being levied on permit holders. This issue has been raised at length during stakeholder engagement events; the NHS is concerned about the potential impact. Where this applies to a permit, can a permit holder also make use of the out-of-scope GBRs?
	This has been removed from the published standard conditions.
G.4	We have only one comment to make on the detail. Guidance G4 states 'disposal routes other than to a sewer are not authorised under this condition'. Given the wording of the Standard Condition, we suspect that the text 'or a relevant river or the sea' has been omitted from this statement. Also, should this strictly be 'and/or' rather than 'or' in both the Standard Condition and the guidance?
	We cannot find reference to this in the guidance consulted on.
G.4.1	This guidance appears to be missing any reference to relevant river or sea, and only covers relevant sewers. This seems to contradict the intention outlined in the Standard Conditions.
	The published guidance includes guidance on what a relevant river is.
I.1.2	It would be helpful for the guidance to go into a little more detail here. In the medical sector, patients are administered radioactive substances and leave the site while still retaining activity. This is not currently addressed in many hospital environmental impact assessments, which work on an assumption of activity being released at the hospital site, and ignore the fact releases may occur elsewhere. Are risk assessments carried out for IRR17 likely to be acceptable here? Does the assessment need to consider factors such as gamma dose to family members, members of the public on the bus with the patient, etc?
	We believe that the assessment should cover all potential public exposure scenarios, and in particular, whether any special precautions are required with regard to any wastes generated beyond the hospital setting. For example, do any dressings, nappies or sharps need to be returned to the hospital because of their radioactive content? It may be appropriate for more detail to be included in sector guidance such as the medical and dental guidance notes. SEPA would be happy to contribute to such a development
I.1.2	It would be helpful for the guidance to go into a little more detail here. In the medical sector, patients are administered radioactive substances and leave the site while still retaining activity. This is not currently addressed in many hospital environmental impact

	assessments, which work on an assumption of activity being released at the hospital site, and ignore the fact releases may occur elsewhere. Are risk assessments carried out for IRR17 likely to be acceptable here? Does the assessment need to consider factors such as gamma dose to family members, members of the public on the bus with the patient, etc?
	We believe that the assessment should cover all potential public exposure scenarios, and in particular, whether any special precautions are required with regard to any wastes generated beyond the hospital setting. For example, do any dressings, nappies or sharps need to be returned to the hospital because of their radioactive content? It may be appropriate for more detail to be included in sector guidance such as the medical and dental guidance notes. SEPA would be happy to contribute to such a development
I.1.2	Assessment of exposure to public. It is not clear what would be required of an NHS facility here – the guidance is insufficient. Guidance, a methodology and tools are required that will allow Health Boards to continue to diagnose, treat and promptly discharge patients as now, whilst taking into account that the health board has no control over what the patient does post-discharge and it cannot be determined on a patient by patient basis. Is public exposure from a post-injection patient within the remit of these environmental regulations? Dose limits for the public are set by IRR17 whilst IRMER17 covers the optimisation of patient dose. What is meant by an unplanned exposure of the public with respect to patients leaving hospital having been injected with short half life radioactive substances?
	The remit given to SEPA for the control of radioactive material, including its administration to patients, is predicated on the need to control and minimise any resulting radioactive wastes. We believe that the assessment should cover all potential public exposure scenarios, and in particular, whether any special precautions are required with regard to any wastes generated beyond the hospital setting. For example, do any dressings, nappies or sharps need to be returned to the hospital because of their radioactive content? It may be appropriate for more detail to be included in sector guidance such as the medical and dental guidance notes. SEPA would be happy to contribute to such a development
I.3.1	Minimisation of public exposure. The same concerns are for I1.2.
	The remit given to SEPA for the control of radioactive material, including its administration to patients, is predicated on the need to control and minimise any resulting radioactive wastes. IRR17 relates to worker exposure, IRMER17 to the patient and EASR to any public exposure relating to any wastes generated.
J	Environmental monitoring. There should not be a goal setting approach to environmental monitoring as it could have a significant resource implication. More explicit guidance should be provided. Will the requirement for monitoring be dependent upon the levels of discharge to ensure proportionality? Is there a link here with A7?
	The condition is goal setting to allow authorised persons flexibility; it is perhaps an area where different sectors could produce their own guidance if it is needed. Furthermore, the requirement to have an environmental monitoring programme will not be universal and will likely only be applied to the persons who are already required to have an environmental monitoring programme.

K.1.5	I'm pleased to see you're keeping the NORM isotopes simple and not asking for difficult to measure things like Bi-210 and Ra-224 as the EA have decided.
Schedules	Guidance on the schedules would be welcome. Although they may seem like simple lists, there is scope for interpretation on terms such as "description of... all the radionuclides" in schedule 1; does this mean a physical description, chemical description, both, or something else?
	The schedules have been worded to cover a wide range of industries, and as a result are generic. It is difficult to provide further guidance without becoming too industry-specific, which would cause the guidance to expand beyond the high-level guidance it was aimed at. SEPA encourages the different industries to decide on their own interpretations in these circumstances and we are more than happy to assist you in this work, which we may refer to in future guidance.
Schedules	Guidance on the schedules would be welcome. Although they may seem like simple lists, there is scope for interpretation on terms such as "description of... all the radionuclides" in schedule 1; does this mean a physical description, chemical description, both, or something else?
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Question 3 – Do you foresee any problems in using and complying with the standard conditions?	
General	Assume that Bespoke conditions begin at H3.
	No, all the conditions are standard conditions, bespoke conditions will be included in permits if needed. However, not all standard conditions will apply to all authorised persons.
General	Is it possible to get a Standard Condition that is modified then by a Bespoke Condition e.g. SC states G applies, but Bespoke then states not section G2?
	Yes, a bespoke condition will override a standard condition.
General	As well as a number of comments to make on the content of specific conditions, listed below, we would like to recommend that arrangements for contacting SEPA in an event should form part of the Permit or the Standard Conditions, rather than part of the guidance. We also suggest that SEPA considers specifying subsections of the standard conditions apply and which do not in the draft Certificate to avoid confusion about exactly which provisions are applicable.
	We have not included contact details in the standard conditions as if they change we will need to change the standard conditions in accordance with the process set out in the Environmental Authorisations (Scotland) Regulations 2018. This is no different to what we

	did under RSA93 where we did not include contact details in authorisations. We would expect contact information to be included in the authorised person's procedures and management systems as appropriate. The published standard conditions have been set out so that a whole section will apply rather than individual conditions.
General	No, There has been much opportunity to be briefed about all aspects of this, and participation in the workshops did not throw up any problems for us. However, regular users of the SC may differ.
General	In general, Magnox do not foresee problems in using and complying with the proposed Standard Conditions.
General	Overall I can't see any major problems with complying with the guidance. Organisations that already have suitable management and document systems in place should have a smooth transition. Work will be required to ensure that assessments, plans and documentation are maintained to a suitable level for those organisations who don't.
General	Consistency will be required from the regulator. Individuals may have differing interpretations of what is reasonable or proportionate.
General	No, the conditions are very clear and easy to comply with.
General	As the conditions are within a goal-setting framework, consistency for the sector in terms of regulatory opinion on what is reasonable practicable and proportionate to the risks associated with radioactive substances in the offshore environment will be critical to the success of the standard conditions approach. Condition A.9.1, for example, instructs the authorised person to inform SEPA when a non-compliance with any requirement might occur, which could be interpreted very widely, but the BSSD requirement on which it is based refers specifically to the potential for an event to lead to "the exposure of an individual beyond the operational limits or conditions of operation …with regard to occupational or public exposure".
A.1	Is there a requirement to demonstrate adequate financial provision other than for HASS?
	There is no specific requirement to demonstrate adequate financial provision for radioactive substances other than HASS. However, standard condition A.1.1 requires adequate financial and human resources to ensure compliance, which could include disposal costs, and it is something that we might expect to be addressed in the waste management plan.
A.2.1	Not clear if the management system in place is 'integrated' as per SEPA definition. (Guidance states that management of radioactive substances should not be a stand-alone system, but part of overall management system including quality and health & safety.)
	We have removed the word "integrated" from the published standard conditions.
A.4	A4 – Record Keeping. "Make and retain" implies retention of every record for ever which we consider would be a disproportionate requirement. We note that the guidance states that this is not the intention. Magnox considers that the wording of the Standard Condition should be amended to reflect the true intention e.g. "retain for a suitable period" or similar.
	We have amended the wording in the published standard conditions to say "as long as necessary to ensure and demonstrate compliance with your authorisation".
A.5	Is there an expectation that management personnel at a level above site RPS level should have formal documented training? This includes personnel based off-site in managerial roles.

	It depends on whether their role might affect compliance. The authorised person should identify who needs to be suitably trained and experienced and then it is up to the authorised person to determine how that is achieved and record it in such a way to demonstrate compliance.
A.6.3	If a site is complying with conditions (a) and (b), what would they need to do in addition to comply with (c)? This is not clear.
	This standard condition applies to all facilities and equipment. For example, if you have an intruder alarm as part of your site security it might be maintained in good repair but if it is not switched on it is not effective. Similarly a filter used for abatement may be maintained in good repair and regularly tested for efficiency but if it is not properly connected up to the stack it will not be effective or correctly used.
A.6.3	If a site is complying with conditions (a) and (b), what would they need to do in addition to comply with (c)? This is not clear.
	This standard condition applies to all facilities and equipment. For example, if you have an intruder alarm as part of your site security it might be maintained in good repair but if it is not switched on it is not effective. Similarly a filter used for abatement may be maintained in good repair and regularly tested for efficiency but if it is not properly connected up to the stack it will not be effective or correctly used.
A.7.2	This presents an opportunity for the alignment of terminology between England & Wales, and Scotland. We recommend that Best Available Techniques is used in place of 'best practicable means', as this would help operators with installation in both England/Wales and Scotland to align their procedures across their operations.
	We decided to continue using best practicable as it is well established terminology and we did not want it to be confused with BAT in other regulatory regimes which may not be the same.
A.8	Covers transfers of waste for offshore sites which leads to double reporting for onshore disposals. Is there any scope for exemption under K conditions? These transfers are already reported via EEMS. Additionally, the information requested includes total volume which is often rather inaccurate due to unknown densities, is there scope to require volume or weight under Schedule 2 as volumes would generally be derived using an estimated density and a measured weight.
	Work is on-going to see if the information reported to EEMS can be accessed and used by SEPA to satisfy this requirement. Schedule 2 was amended to allow reporting of either volume or weight.
A.9	A9 (and Schedule 3) – Contraventions of your Authorisation. The specification of 'by telephone' appears overly prescriptive.
	This is because we have 24/7 on call arrangements via our SEPA Communications Centre and telephone is the best way to contact them and ensure that information gets passed on to the radioactive substances on-call officer.
A.9.1	"Contravene a requirement" is very general and a bit of a "catch all", which requirements does this apply to? Current permits are more specific to accumulation and disposal. This could become overly onerous and are minor infringements necessarily reportable? Could SEPA handle the inevitable inundation of notifications? E.g. an out of calibration meter is not a contravention if it is not used; however, this might lead to a contravention so would be notifiable if taken at face value – is there regulatory benefit to notifying SEPA of such things?

	This is an existing authorisation condition under RSA93 for both nuclear and non-nuclear activities. The BSSD requires that ""significant" events are reported to the regulator, without defining "significant". Depending on the event, SEPA may need to take action to reduce or minimise any public exposure. Instead of trying to define this, we have stated that all such events must be reported to us.
A.9.1	Inform SEPA if you "might contravene a requirement of your authorisation". Taking this at face value, you would get a lot of unnecessary notifications. My suggestion would be to have something in the guidance about seeking the advice of the RWA first (unless urgent).
	This is an existing authorisation condition under RSA93 for both nuclear and non-nuclear activities. The BSSD requires that ""significant" events are reported to the regulator, without defining "significant". Depending on the event, SEPA may need to take action to reduce or minimise any public exposure. Instead of trying to define this, we have stated that all such events must be reported to us.
A.9.2	We believe that clarification in the Standard Conditions of the requirements for notification is necessary to ensure that notification is prompt, given by the right means and is in accordance with the timescales expected. At present most of this information is located within in the guidance which, strictly, does need to be available to those working under an authorisation and may therefore not be as readily available.
	We have not included contact details in the standard conditions as if they change we will need to change the standard conditions in accordance with the process set out in the Environmental Authorisations (Scotland) Regulations 2018. This is no different to what we did under RSA93 where we did not include contact details in authorisations. We would expect contact information to be included in the authorised person's procedures and management systems as appropriate.
A.2.2	Unsure if there is an audit of the management system as a whole, or just of individual parts of the system.
	It is up to the authorised person to decide whether to review the whole management system at once or to have a programme to review different parts at different times.
Appendix 1	Are the schedules in Appendix 1 set wording that cannot be modified....or are these just examples?
	Once the schedules are published as part of the standard conditions we will need to follow the process set out in the Environmental Authorisations (Scotland) Regulations 2018 to change them.
B.10	General: these provisions lack clarity for application for Nuclear Licensed Sites and have the potential for conflict between regulators. For example, the security of radioactive substances on a Nuclear Licensed Site is regulated by the ONR. We believe that these provisions should not be applied to a Nuclear Licensed site. If it is not possible to amend the Standard Conditions to do this, the guidance should make it clear that this provision should not be applied.
	The Environmental Authorisations (Scotland) Regulations 2018 make it clear that they do not apply to radioactive material on a nuclear licensed site and this includes security. We are working closely with ONR to ensure that there is no conflict between regulators.
B.11	Should probably mention Corporate RWA arrangements.
	Corporate RWAs are included in the definition of Radioactive Waste Adviser.

B.11.1	"Acceptance into service..." is strange wording, surely we should be advising on the preparation and implementation of procedures and advising on appropriate instrumentation. Accepting into service does not fit with the RWA being an *adviser*. We can only provide our recommendations. Refer to Environment Agencies' guidance doc RWA-G-4 section 3.2.
	This is based on the BSSD wording and is the same as used in RSA93 authorisations. The condition only requires RWAs to advise on compliance.
B.11.1	Has a number of overlaps with the RPA role. Clarity on the distinction between the roles would be helpful to ensure the correct person carried out the correct task.
	The RWA is required by environment agencies to advise on radioactive waste legislation and environmental radiation protection; the role is clearly set out in the RWA statement and guidance. The RPA is required by the HSE.
B.2	Are we expecting an update to definition and guidance of BPM?
	No, there is no change.
B.2.2	This condition requires the minimisation of the volume of liquid and gaseous radioactive waste requiring disposal. This has not previously applied to these waste types so clarification of SEPA's intentions for these wastes, as it is unclear whether SEPA is primarily concerned by total volumes, or total radioactivity of disposals.
	The published standard condition has been changed to remove reference to volume.
B.2.2	B2.2 – Radioactive Waste Optimisation. The application of the requirement to minimise the volume of gaseous and aqueous liquid wastes in discharges appears inappropriate. The optimal level of protection of the environment and the public may well not be achieved with such a requirement, as it appears to imply maximising the concentrations of radioactivity in such discharges.
	The published standard condition has been changed to remove reference to volume.
B.4.1	Return of patient waste to a hospital (eg following I-131 therapeutic administration to a patient with incontinence) would need to be allowed for using this condition on some medical sites.
	Agreed.
B.4.1	Return of patient waste to a hospital (eg following I-131 therapeutic administration to a patient with incontinence) would need to be allowed for using this condition on some medical sites.
	Agreed.
B.5	General: these requirements are already covered by the site licence on nuclear sites, so these Standard Conditions effectively introduce a regulatory overlap between SEPA and the ONR. This is a point that EDF Energy made in its response to the Scottish Government's consultation on the draft Integrated Authorisation Framework. With no substantive response having been received about our concerns, we remain unclear as to how SEPA and ONR would manage situations where an operator of a nuclear licensed site is placed in a position where they have conflicting requirements from both regulators.
	SEPA and ONR are working closely together to ensure that there will not be conflicting requirements.
B.5 and B.8	Conditions B5 and B8 – Safe Management and Holdings of Radioactive Substances.

	These conditions appear to cover matters which, for a nuclear licensed site, are already covered by separate legislation (e.g. NIA65 Site Licence). Magnox considers duplicate regulation to be undesirable and inefficient.
	SEPA and ONR are working closely together to ensure that there will not be dual regulation.
B.5.4	This condition appears to require operators of Nuclear Licensed Sites to unnecessarily increase the handling of radioactive waste which is inconsistent with the principles of keeping this As Low As Reasonably Practicable (ALARP). Furthermore, this condition is inappropriate for radioactive waste as this is already covered by our Nuclear Site Licence conditions to control all our radioactive substances and keep access to them ALARP. We believe that SEPA has inappropriately extended an appropriate condition for radioactive sources to all radioactive substances and suggest that this extension be reversed.
	The standard condition does not explicitly require handling of radioactive substances but only reflects routine accountancy checks that are already carried out.
B.5.5	In relation to in-situ pipework/equipment at oil and gas facilities, can we assume that these do not have to be labelled unless removed from the process?
	This has been incorporated into the published guidance.
B.6	General: we believe that an equivalent provision for liquid wastes to that proposed for gaseous wastes (H2) would formally recognise the discharge of liquids which cannot practicably be directed to routes specified in the authorisation. An example of such liquids would be condensed steam form secondary circuits which has become very slightly contaminated by tritium and is radiologically insignificant.
	Work is currently underway to look at provisions for liquid discharges.
B.6.2	No definition of dispersal. We are happy to determine what constitutes a dispersal ourselves if this is the intention (in the spirit of goal-setting). Similarly, no definition of remediation.
	Any terms that have specific meanings are given in the standard conditions; terms not defined have their normal dictionary definition.
B.8	ONR regulate sources on nuclear sites – so we assume this and sections D/E/F do not apply to nuclear sites.
	Yes, as shown on the example permit for a nuclear site in this consultation.
B.8	General: these requirements are already covered by arrangements to comply with Licence Conditions 4 and 32, so imposition on a licensee is unnecessary where a nuclear site licence is in force.
	Regulation of radioactive material on a nuclear licensed site is exempt from regulation under the Environmental Authorisations (Scotland) Regulations 2018 so will not be subject to standard conditions relating to radioactive material.
B.8.3	Guidance stating that items cannot be held indefinitely based on cost alone is a POSITIVE addition.
B.8.3	We believe that the wording “you must transfer or dispose of radioactive waste as soon as reasonably practicable after it has become waste” could be at odds with the Best Practicable Means for dealing with radioactive waste, that is unless ‘reasonably practicable’ is intended to take BPM into account. Furthermore, on nuclear licensed sites, the requirement to minimise the accumulation of radioactive waste is already regulated by ONR under site licence conditions. This is another example where operators or nuclear sites may have conflicting requirements placed upon them due to this new overlapping of powers by SEPA and ONR.

	"Reasonably practicable" does take BPM into account. SEPA and ONR are working closely together to ensure that there are no conflicting requirements.
C	We are unclear if Section C - Transfers of radioactive substances will apply to D3100 LLWF activities.
	Yes it will.
C	could be difficult for disposing of linacs or other activated materials
	Unsure which standard condition this comment related to in section C.
C.2.3	Could the SEPA note system be extended to radioactive substances as a method of obtaining confirmation and receipts?
	The special (hazardous) waste notes used by the UK environment agencies to track hazardous wastes could form the basis of a system for radioactive waste transfers; however, currently, radioactive waste is excluded from the definition of Directive waste, and therefore it would not be appropriate for radioactive waste to appear on these notes.
C.5	General: as it is currently written, we believe that the requirement goes beyond what is required by the Scottish Government's Higher Activity Waste policy and suggest that it be re-written to align with the policy. Whereas this condition currently requires any ILW to be returned after treatment, the policy only requires that waste be returned if it would add materially to the waste needing to be disposed of in the destination country, a decision which should be made by the competent authorities in those countries. As written the current text of this condition is placing additional constraints on operators.
	Published standard condition has been amended.
C.5	It is not clear why the standard condition for transfer of ILW (C5) is not fully aligned to Scottish Government Policy. For example, C5 requires the return of any ILW following treatment. However, Scottish Policy states that where treatment would add materially to the waste needing to be disposed of in a country of destination, including in other parts of the UK, the presumption should be that it will be returned to Scotland. This has been interpreted that any ILW remaining after treatment will be returned to Scotland – this is more onerous than Scottish Policy.
	Published standard condition has been amended.
C.6	General: as for C.5, we believe that the requirement goes beyond what is required by the Scottish Government's Higher Activity waste policy and suggest that it we re-written to align with this policy.
	Published standard condition has been amended.
D	Is there any scope for adding a condition that allows like-for-like sources to be held on site up to 2x Cat 3 for a short period to allow for replacements to be carried out? Presumably for sites with more than Cat 3 aggregate there will be a condition temporarily allowing double the activity for this purpose.
	There is scope to consider this as a bespoke condition in a permit if requested at application.
D	I note there is no provision in the standard conditions to allow the maximum holdings to be exceeded during a source swap (like for like replacement). Will it be in the bespoke permits? This is a very sensible condition in the existing registrations and I would like to see it continue.

	There is scope to consider this as a bespoke condition in a permit if requested at application.
D	Should there be another condition relating to the annual return to SEPA stated in it?
	There is no longer a requirement for an annual return, it has been removed from the 2013 BSSD and is not included in the Environmental Authorisations (Scotland) Regulations 2018.
D.1.1	Condition states that the activity aggregate "does not exceed IAEA Cat 3" whereas the consultation document states (4.22) that activity aggregate is "less than IAEA Cat 3". This discrepancy is a factor of 10 for A/D definition and will have a huge impact on our clients depending on which is correct. Please clarify.
	The limit is category 3, i.e. less than category 2.
D.2	As discussed in consultation, is it better to not refer to 2011 but rather the most recent edition? The security document is not made widely available, which does not help with compliance. It would be useful if SEPA could obtain blanket permission to circulate it to permit holders.
	We have to refer to a specific version so that if it changes we have to follow the process set out in the Environmental Authorisations (Scotland) Regulations 2018 for amending standard conditions, i.e. consultation and informing everyone that the change applies to. Otherwise the guidance could change and therefore what the authorised person needs to comply with without them knowing. The document is not ours so we do not have permission to circulate it to authorised persons but the CTSAs are quite happy to let people have copies. We have repeatedly tried to get the security marking changed but without success.
D.2	The security document is not made widely available, which does not help with compliance. It would be useful if SEPA could obtain blanket permission to circulate it to permit holders.
	The document is not ours so we do not have permission to circulate it to authorised persons but the CTSAs are quite happy to let people have copies. We have repeatedly tried to get the security marking changed but without success.
G	Does H2 include adventitious releases or are they not covered anywhere?
	G.5 establishes the same provisions in the standard conditions that appeared in the 2011 Exemption Order for fugitive or adventitious gaseous releases.
G.1.4	G1.4 Generic Disposal Requirements. 'Minimise the quantity of radionuclides' can be read as minimising the number of radionuclides in the discharge. We suspect that this may be a wording issue, and that the intent is to use BPM to minimise the quantity of radioactivity discharged to the environment. Magnox suggests that the wording is revised for clarification.
	The term "quantity of radionuclides" is the same as used elsewhere in the Environmental Authorisations (Scotland) Regulations 2018. We agree that it could be misinterpreted and will improve the guidance for this conditions.
G.2.1	G2.1 Evaluation of Release. As per comment for G1.4, Magnox suggests that the wording is reviewed. We assume that the intent is to evaluate the quantity of radioactivity discharged, rather than how many nuclides are discharged.
	The term "quantity of radionuclides" is the same as used elsewhere in the Environmental Authorisations (Scotland) Regulations 2018. We agree that it could be misinterpreted and will improve the guidance for this conditions.

G.3	G3 Disposal in Normal Refuse. It is not clear why this is limited to ‘non-metallic’ waste.
	This has been removed in the published standard conditions to be consistent with the GBR provisions however we may include bespoke conditions in permits for metallic waste if appropriate.
G.3.1	The addition of the term "non-metallic" into this condition will be problematic for some waste streams in the medical sector, in particular those using sealed sources and operators of medical cyclotrons currently using this route for activated metallic components such as target foils following suitable decay. There will now be a potentially significant cost to dispose of this material via a specialist contractor, which may be challenging because of the difficulties in accurately characterising the component radionuclides in the waste items. An allowance would be useful, perhaps if the waste operator could guarantee disposal to landfill with no sorting of metallic waste.
	This has been removed in the published standard conditions to be consistent with the GBR provisions however we may include bespoke conditions in permits for metallic waste if appropriate.
G.3.1	The addition of the term "non-metallic" into this condition will be problematic for some waste streams in the medical sector, in particular operators of medical cyclotrons currently using this route for metallic components such as target foils following suitable decay. There will now be a potentially significant cost to dispose of this material via a specialist contractor, which may be challenging because of the difficulties in accurately characterising the component radionuclides in the waste items. An allowance would be useful, perhaps if the waste operator could guarantee disposal to landfill with no sorting of metallic waste.
	This has been removed in the published standard conditions to be consistent with the GBR provisions however we may include bespoke conditions in permits for metallic waste if appropriate.
G.3.1	The main issue we have is with G.3.1 regarding disposal of only “non-metallic” radioactive waste via dustbin route. Our cyclotron produces many waste parts/foils that are metallic. We understand the reason for this standard condition and we don't necessarily disagree with it, but it is likely to cause problems in terms of disposal of these items.
	This has been removed in the published standard conditions to be consistent with the GBR provisions however we may include bespoke conditions in permits for metallic waste if appropriate.
H.1	H1 – Assessment of public exposure and the environment. This currently states that an assessment of exposure and impact resulting from your disposals is required. Magnox considers that this should read ‘discharges’ as indicated in the guidance provided (the guidance and the standard condition are not consistent).
	The published guidance has been updated to be consistent with the standard condition and the term “disposals”.
H.2	Section H2 includes fugitive emissions e.g. remediation of contaminated land, demolition of contaminated buildings. Do G5 and H2 both relate to fugitive emissions in different contexts?
	G.5 establishes the same provisions in the standard conditions that appeared in the 2011 Exemption Order for fugitive or adventitious gaseous releases. H.2 is a new condition that takes account of situations including the remediation of large areas of ground or buildings where it may not be practicable to direct all possible gaseous emissions to an authorised outlet. G.5 is given to anyone who handles

	radioactive waste or radioactive material in open form; whereas, H.2 is only given to someone who has a bespoke disposal condition specified in their permit.
H.2.1	We welcome this condition for gaseous wastes which cannot practicably be routed via an authorised gaseous outlet. We believe that an equivalent provision for liquid wastes to that proposed here for gaseous wastes would formally recognise the discharge of liquids which cannot practicably be directed to routes specified in the authorisation.
	SEPA note that government is currently undertaking a review of the regulation of liquid discharges. We are awaiting the outcome of this review before making any changes for liquids.
I.1.3	This crosses into both IRMER and IRR territory. It would be good to have joined up thinking on it.
	Agreed – we consider that the IPEM medical and dental guidance notes may be able to provide guidance on this and would be happy to work with IPEM to develop this further.
Interpretation of terms	Interpretation of terms There is an inconsistency in the definition of 'week' between 'Weekly Advisory Level' in the example nuclear permit (“a period of 7 consecutive days commencing at a day and a time to be notified in writing to SEPA by the Authorisation Holder at least 14 days before any disposal of radioactive waste is made under the terms of this Authorisation, any subsequent change being notified in writing to SEPA at least 7 days in advance") and the Standard conditions 'week' ("any period of 7 consecutive days"). We would welcome clarification as to whether or not this distinction is intentional.
	Definition of a week has been removed in the published standard conditions as the term is not used in the standard conditions. Should it be necessary to define this in terms of a bespoke conditions, e.g. in relation to weekly advisory level this would be included in the permit.
K	Section K. Dounreay holds waste from oil and gas exploration as well as its own nuclear activities. Will this be covered by bespoke conditions if any are needed?
	Yes.
Schedule 1	Transfer records are required to include volume or weight; this may be difficult in medical radiopharmaceutical production where volume may not be accurately known, since the product is dispensed based on the activity.
	In this case, it would be acceptable to provide a nominal weight or volume, the volume of the container containing the radiopharmaceutical.
Schedule 1	Transfer records are required to include volume or weight; this may be difficult in medical radiopharmaceutical production where volume may not be accurately known, since the product is dispensed based on the activity.
	In this case, it would be acceptable to provide a nominal weight or volume, the volume of the container containing the radiopharmaceutical.
Schedule 2	Schedule 2 states 28 day return is not feasible – currently 90 days.
	This can be amended by inclusion of a bespoke condition.

Schedule 2	Schedule 2 states 8 weeks return is not feasible – currently 12 weeks.
	This can be amended by inclusion of a bespoke condition.

Question 4 – Do you foresee any problems with the proposed approach to regulating contaminated items on authorised premises?
Removal of distinction between "contaminated items" and "radioactive substances" and a requirement to have a full inventory of radioactive substances could lead to significant problems within the oil and gas industry. It is generally not possible to keep an inventory of the contaminated items in-situ as we simply don't know what is present on an oil and gas installation until we break containment of a system. Need clarity on what will be expected of sites in terms of inventory for material on internal surfaces. Suggest that no specific inventory should be required for equipment currently in use/in-situ. Must we keep records in accordance with Schedule 1 for in-situ/in-use plant and equipment, e.g. pipework?
We recognise that it may not be possible in all situations to know the amount of contamination present, particularly when that equipment is still in use. However, we would still expect you to know what pieces of equipment or systems could be contaminated and with what radionuclides. We would expect that the inventory would allow you to reasonably identify which pieces of equipment are likely to be contaminated in order to prevent accidental transfer to someone who is not legally entitled to receive them and to assist you when it comes time to decommission the area.
What is the definition of contaminated items and what data is expected to be contained in inventories?
Contaminated items has not been defined, but we would expect that any sustained reading above background is likely to indicate the presence of contamination. The regulation of radioactive material, including contaminated items that are not waste, on a nuclear site is exempted under EASR. For nuclear sites we would expect the waste management plan to contain or refer to an adequate inventory of radioactive waste, the level of detail will be dependent on the specific situation but could be based on the radionuclide fingerprint and types of materials present in a facility rather than details of every contaminated item.
We have some concerns about the proposed approach about contaminated items. EDF Energy has previously expressed its concerns about the regulatory overlap on Nuclear Licensed Sites between SEPA and the ONR. Notwithstanding those concerns, further clarity is required as to how SEPA intends conditions on contaminated items to work in practice. We would like to highlight that there is potential for the conditions B.5.4 & B.5.5 to be interpreted differently by different individuals. In particular there should be recognition in the guidance of the existing arrangements on nuclear sites where ONR has a role in relation to radioactive materials and contaminated items are managed by controlling access to/from areas.
The regulation of radioactive material, including contaminated items that are not waste, on a nuclear site is exempted under EASR. We agree that in many cases, existing arrangements on nuclear sites will be adequate to address our requirements. In particular, the identification and marking of controlled areas will often satisfy our marking and labelling requirement. It is anticipated that our guidance will be updated to reflect experience and best practice and this is an area that could benefit from further detailed guidance.
No. Problems would occur if premises or those running them were inadequate. Having to be authorised should ensure that only well run and regulated premises and licence holders are involved.

Yes there could be a lot of problems with this approach due to activation products from the use of linacs and cyclotrons. Not only will the components of the machines become activated but also surrounding building material and other fixtures and fittings as well as waste water etc. from cyclotron production. It would be very difficult to accurately determine the levels of radioactive materials within these pieces of equipment without invasive investigations which would affect the operation of the machines or reduce the integrity of the shielding for such machines. In a hospital setting with the limited time and resources available this would not be feasible. Either generic conditions for these machines or exemptions would be required. Otherwise how are you going to comply with B.8 of Standard Conditions?
We recognise that it may not be possible in all situations to know the amount of contamination present, particularly when that equipment is still in use. However, we would still expect you to know what pieces of equipment or systems could be contaminated and with what radionuclides. We would expect that the inventory would allow you to reasonably identify which pieces of equipment are likely to be contaminated in order to prevent accidental transfer to someone who is not legally entitled to receive them and to assist you when it comes time to decommission the area.
It is not clear to Magnox what the impact of this proposed approach will be. It appears to cover matters that are already subject to separate regulation on Nuclear Licenced Sites. Magnox considers duplicate regulation to be undesirable and inefficient.
We would not expect there to be practical implications on nuclear sites that have good waste management arrangements in place. As noted above, exiting arrangements on nuclear sites that are in place to satisfy nuclear site licensing or IRR requirements will in many cases be sufficient to satisfy our conditions and no extra measures will be needed.
Do activated items fall under this category such cyclotron components?
Yes.
No; please clarify if GBR out-of-scope can be applied to radioactive waste where standard conditions are also in force.
Having a permit or being subject to standard condition has no effect on the application of the out of scope values. Out of scope values can always be applied to any substance as these are the values that define whether or not it is radioactive for the purposes of the legislation. Whether or not a GBR can be used if you have a permit with standard conditions will depend on the specific GBR and permit in question. However, in general terms if you have a permit for specific activity any GBR for the same activity will not apply. Note that many disposal provisions in GBRs have been replicated in the standard condition to ensure that you are not disadvantaged by having a permit.
We have a concern about the example given in the guidance with regards to labelling of contaminated equipment at B5.5. and request clarification. The example given is “NORM contamination of a valve”. The reason under this condition suggests that the intention of this requirement would require a label for contaminated items only once removed from the process train, and therefore at risk of loss or unplanned exposure. The example given is potentially ambiguous and could potentially give rise to a situation where the process train requires labelling throughout its lifecycle because of the likelihood of NORM contamination.
The guidance has been updated to indicate that it may be appropriate to identify a space as containing contaminated items rather than every item itself. Alternatively, it may be possible to identify the process train in some other way than attaching a trefoil labelling the pipework and equipment involved, e.g. all potentially contaminated pipework is painted in a particular colour. In both cases the associated management arrangements would need to be sufficiently robust to ensure that when a piece of the train was removed it was recognised as being potentially contaminated.

Although the proposed approach addresses a current issue regarding the regulation of contaminated items we foresee an issue with some industries such as oil and gas producers. They often remove equipment out of the process for short term maintenance before the item is reinstalled. Having to create accountancy records for these scenarios serves no purpose as a record will be relevant for a maximum of 48 hours. We would propose including an exemption for these situations. Under IRR sites are obligated to keep monitoring records for everything they have monitored onsite, some operators may see this condition as a duplication of records.
If the records required for IRR17 also satisfy the requirements of the standard conditions, there is no need to keep separate records.

Question 5 – Do you foresee any problems with the proposed changes to the regulation of radioactive waste transfers?
4.10 of the consultation document has implications for decommissioning of oil and gas facilities. Some contracts are being awarded strictly on cost and only then is a proper audit being carried out, by which time it is not possible to have a significant impact on what is carried out on the site. This change is not a bad thing but will have an effect on decommissioning.
What is the definition of transfer? Presumably this is external to the site not internal. It is unclear whether Section C - Transfers Section is applicable to D3100 LLWF as this is not included within our current RSA authorisation, however there may be a future need to transfer radioactive waste generated at the D3100 disposal facility to Dounreay Nuclear Site for treatment prior to final disposal at D3100 LLWF.
This is a site specific question and should be discussed with your inspector.
It appears straightforward If transfer is the best practicable option environmentally and "duty of care" is applied to all transfers with oversight from ONR. A problem could be lack of necessity to consult public. Transfer of waste carries risk and although routine transfers can consolidate good working practice it can also lead to a relaxed attitude about transfers.
It could be difficult giving exact details of activities for activated linac and cyclotron components.
In order to meet any receiving site's Waste Acceptance Criteria, it will be necessary to establish the activities of the waste. It may still be possible to meet these criteria if only a range of activities or a maximum activity is known.
Magnox does not foresee any problems with the proposed changes to radioactive waste transfers. We consider the proposed changes represent a significant step forward.
It appears that we are already compliant with the provisions as "duty of care" requirement will be satisfied by ensuring that the organising receiving the waste has a suitable permit in place, this is something we already do.
If the proposed changes bring the transfer of radioactive waste in line with that of other waste streams, we foresee no significant problems with the approach.

No. One question for clarification, Condition C.5.1 stipulates ILW cannot be transferred to a permitted person in the UK outside of Scotland unless it is going for treatment and the waste must be returned post treatment. What is the stance on ILW and LLW being transferred from the UK into Scotland for disposal? Condition 2.1 refers to disposal in normal refuse as not being a transfer (and therefore not requiring a Transfer Record). But does this non-requirement extend to all other, current 'conditionally-exempt' Table 3 waste (i.e. beta lights, thoriated tungsten etc.) and Type 1 and 2 NORM wastes (and are these other substances to be covered under GBR?) It has been noted that the GBR have not yet been issued (hence the request for clarification above), are they going to be issued for comment?
The GBRs are part of the Environmental Authorisations (Scotland) Regulations 2018 that were published for consultation by Scottish Government in September 2017.

Question 6 – Do you agree with the proposed changes to how we limit holdings of sealed sources in Categories 3 and 4?
No issue in principle, need to clarify as per comment on condition D.1 in Question 3.
Yes. I like the idea and I'll be interested to see how it works in practice.
This seems like a sensible approach, especially with the annual check of holdings to make sure people are still accountable. The reduced need for variations will also save costs to the users.
Yes, although it would be useful to put more details in the guidance on what is meant by IAEA Category 3 and how to evaluate that this is not exceeded. I appreciate that the relevant documents are referenced, but including more details would be convenient for operators with small holdings.
Guidance will be produced on the categorisation of sealed sources.
Yes this is a good approach.
Yes. This reduces the administrative burden on both the holder and the regulator.
Yes, however we have one comments regarding Consultation Document para 4.24. To streamline compliance requirements, we would suggest an amendment to the requirement for annual re-notification of Category 3 / 4 sealed source holdings to i) an initial notification, and ii) subsequent notification following a material change in sealed source holdings (as per the requirement for a HASS)? Please note, the example given in Appendix 2 (3. Mobile High-activity Sealed Source (HASS) Permit) the Co-60 source is 15GBq. Based on the new BSSD (Council Directive 2013/59/Euratom) HASS activity levels a Co-60 source isn't considered HASS until it exceeds 30GBq.
Noted

Question 7 – Do you agree with the proposal to refer to compliance with the standards set out in the document "Security Requirements for Radioactive Sources"?
This seems sensible to stay up-to-date with the most recent security requirements as these will always be updated as each countermeasure is more easily overcome by newer technology or techniques. It would be helpful for SEPA to obtain blanket permission to circulate the document to permit holders. This would also help with staying up to date, as SEPA could then circulate updates of the document to permit holders.
As previous response on this matter.
Yes, but as mentioned previously this document is not made widely available and so it would be helpful for SEPA to obtain blanket permission to circulate it to permit holders. This would also help with staying up to date, as SEPA could then circulate updates of the document to permit holders.
As previous response on this matter.

Question 8 – Do you foresee any problems with the proposal to treat these activities in the same way as an authorisation for radioactive waste?
A risk assessment should already have been completed under IRR for these activities that takes account of doses to members of the public, so it should be easy to link these together provided this is what is being asked for here. Further guidance will be very important to outline exactly what is expected.
This is what is being asked for – we consider that the IPEM medical and dental guidance notes may be able to provide guidance on this and would be happy to work with IPEM to develop this further.
As noted above, further guidance is required on the assessment of public exposures. At present, for SEPA permits, this evaluation is only carried out in terms of an environmental impact assessment considering discharges. Under this proposal, it appears a more wide-ranging assessment is required which appears likely to overlap with IRR17 risk assessments considering exposure to members of the public, e.g. considering gamma dose from nuclear medicine patients to members of the public. Further guidance on SEPA's expectations, in particular how wide-ranging the assessment should be, would be welcome.
We consider that the IPEM medical and dental guidance notes may be able to provide guidance on this and would be happy to work with IPEM to develop this further.
Assessment of exposure to members of the public must be maintained. Guidance does not suggest any frequency or need to re-evaluate assessment. Further explanation or more guidance is needed if SEPA's expectation is different from the short guidance.
We consider that the IPEM medical and dental guidance notes may be able to provide guidance on this and would be happy to work with IPEM to develop this further.
This is a significant change in the requirements and overlaps with the requirements of IRR17 regulation 12 (3). I think it is essential that SEPA and the HSE come to an understanding regarding expectations and make suitable guidance available.

We consider that this is a clarification of arrangements rather than a significant change. We consider that the IPEM medical and dental guidance notes may be able to provide guidance on this and would be happy to work with IPEM to develop this further.
Yes, it is not clear what will be required or how an assessment akin to that for radioactive waste is to be carried out. What is the benefit in treating these activities in the same way as an authorisation for radioactive waste? There is no apparent methodology and any adopted approach may not be consistent across Scotland.
We are happy to work with the sector to ensure a consistent approach. We consider that the IPEM medical and dental guidance notes may be able to provide guidance on this and would be happy to work with IPEM to develop this further.

Question 9 – Do you foresee any issues with the proposed changes to radioactive gaseous discharges outwith authorised outlets?
H2 covers fugitive emissions from contaminated land or demolition of contaminated buildings. G5 covers fugitive emissions from a container. These are both pragmatic and welcome. Does G.5.1 cover fugitive emissions from containers that are not opened i.e. systems that are not designed to be hermetically sealed but are maintained in accordance with international/national engineering standards? Does it cover water evaporation e.g. from a fuel pond or outside water filled disposal facility (Shaft & Silo)?
Nuclear sites will always have bespoke disposal limits of some description and therefore, H.2 will be issued as standard, this is the relevant condition for addressing the situations discussed above and requires you to demonstrate that any discharge cannot be reasonably directed to an authorised outlet. G.5.1 replicates the previous exemption and is not intended to cover these situations.
We welcome this change as it formalises the release of very minor discharges which are radiologically insignificant, but cannot be routed to discharge stacks (these are still accounted for in discharge returns). We would suggest that SEPA considers an equivalent condition for minor liquid discharges via routes which are not specified in permits.
There is a separate UK-wide project looking at liquid clearance and exemption. We are awaiting the outcome of this review before deciding on an appropriate regulatory approach.
It seems preferable to have all radioactive gaseous discharges from authorised outlets, but where these authorised discharge outlets fall short safetywise and environmentally as compared to an unauthorised discharge outlet, then if scrutinised by appropriate regulators to ascertain it would be best option then it should be allowed.
Magnox does not foresee any issues with the proposed changes to radioactive discharges outwith authorised outlets, and considers the inclusion of this condition to be a helpful improvement.

Question 10 – Do you agree with the removal of the requirement to provide three-yearly assessments of the dose to non-human species?
Yes. These should only be required where an incident that has the potential for off-site consequences has occurred, and would therefore be Bespoke to that site under those circumstances.
We agree with the removal of this requirement but would ask for confirmation that our understanding of this new arrangement is correct: (i) the requirement to carry out the assessment (Standard Condition H.1.1), coupled with the requirements for environmental monitoring (Standard Condition J, especially J.1.2) means that all reporting now falls under the routine environmental reporting (calendar quarter); (ii) the permit is non-prescriptive in terms of the content of those reports (providing the requirements of Schedule 2 are met); and, (iii) the detail of the programme need only be notified to the local inspector, with subsequent changes as per Schedule 3.
Yes, your understanding is correct.
Yes. As stated hopefully any adverse trends would be noticed well before this.
Magnox agrees with the removal of the requirement, for the reasons stated in paragraph 4.37 of the consultation document,
Yes, but could be seen by others as being a relaxation in the regulation of nuclear licensed sites?
There is still an ongoing requirement to assess doses and this will be inspected as part of our normal inspection programme so there is no relaxation in the regulation of nuclear licensed sites.

Question 11 – Do you foresee any problems with the requirement to prepare, maintain and implement a waste management plan?
A Site WMP is required under GRR and it is assumed that the requirement in B.9 equates to that. The D3100 LLWF RSA authorisation currently includes a requirement to prepare, maintain and implement a management plan, however this would appear to have differing requirements from the waste management plan required by the proposed Standard Condition. We would appreciate clarity on whether our current management plan would satisfy the requirements of the proposed waste management plan.
This is a site specific question that should be raised with your inspector during transition to your new permit.
A number of hospital facilities will need to think carefully about decommissioning cyclotron facilities and potentially linac bunkers. As a general principle though this is a good idea.
Magnox do not foresee any problems with the requirements around waste management plans provided the requirement is covered by the scope of existing documents (which we consider to be our Integrated Waste Strategy, Radioactive Waste Management Cases and the Lifetime Plan) as is stated in the consultation document at paragraph 4.40.
There is no guidance for creating a waste management plan so the approach may not be consistent across Scotland, or interpreted the same between different SEPA inspectors. Goal setting interpretations of different inspectors could cause problems here.

We are happy to work with the sector to ensure a consistent approach. The IPEM medical and dental guidance notes may be able to provide guidance on this and we would be happy to work with IPEM to develop this further.
Industry has requested the opportunity to develop an approved template for waste management plans for offshore installations to ensure a consistent approach in implementing this condition. Our ability to prepare, maintain and implement these plans will depend on the outcome of process.
We support the principle of industry producing its own guidance.

Question 12 – Do you have any other comments on the Standard Conditions and guidance?
The draft standard conditions for RSA still refer to BPM. When the new Environmental Authorisations (Scotland) Regulations 2018 come into force and eventually takes in all permits (not just RSA) will BPM be replaced by BAT? Or will we still work to BAT and BPM depending upon the permitted activity? How does optimisation differ? The meaning of 'Authorised Person' appears to have changed from the description within the current Interpretation of Terms of the D3100 LLWF RSA authorisation. It is suggested that 'Authorised Person' is included in the Interpretation of Terms for the Standard Conditions. The 'intermediate level radioactive waste' description in the draft Standard Conditions Interpretations of Terms refers to 'Low Level Wastes', suggest this should refer to 'low level radioactive waste' to align with the related description in the proposed Interpretation of Terms. The 'decommissioning' description in the draft Standard Conditions Interpretations of Terms refers to the Authorisation Holder, suggest that this should be changed to Authorised Person to align with the language used within the Standard Conditions. It is suggested that SEPA considers adding the following descriptions to the Standard Conditions Interpretation of Terms: • authorised place • section • Best Practicable Means • organisms • transfer • dispose • waste management plan • samples • fugitive releases • radiological effects • optimal • integrated management system • small quantities • radioactive substances • radioactive waste

• radioactive material • adventitious release • container • contaminated items Further clarity is required from SEPA with regards to BPM and optimisation. It is noted that Standard Condition B.1.1 requires optimal level of protection of the environment and the public, which is a change in language to the BPM based conditions utilised in the current standard Authorisation template. The consultation does not reference how, and to what timescales SEPA intends to implement the new regulations for radioactive substances users. Further information would be gratefully received on this topic particularly given the D3100 LLWF intention to submit an application to vary the current authorisation.
The interpretation of terms has been reviewed following the consultation; terms not defined have their normal dictionary definition. We will continue to use BPM; explanation of the relationship between optimisation and best practicable means is provided in our guidance on "Satisfying the ALARA requirement and best practicable means".
They have been considered comprehensively and in great depth by SEPA. They appear very well structured and easy to understand. Hopefully, it will ensure robust standards and there will be sufficient manpower to check all SC are being fulfilled by the growing number of people charged with dealing with the radioactive materials and waste.
A sensible and simplified approach
Magnox consider the proposed Standard Conditions and Guidance represent a useful improvement to the regulation of radioactive substances in Scotland.
A.6.3: comment regarding the wording of the condition: if you are doing (a) & (b), then by default are you not also doing (c)? Unsure what the additional requirement is for (c).
This standard condition applies to all facilities and equipment. For example, if you have an intruder alarm as part of your site security it might be maintained in good repair but if it is not switched on it is not effective. Similarly a filter used for abatement may be maintained in good repair and regularly tested for efficiency but if it is not properly connected up to the stack it will not be effective or correctly used.
More guidance please Examples of suitable review or audit of the integrated management system would be useful. Throughout standard conditions a number of management systems are identified (integrated, controlled document, quality, asset and waste). Most are fairly well defined or understood but how they will be assessed and considered acceptable is not.
We support the principle of industry producing its own guidance and these areas may be suitable for this.
Overall a good approach
General concerns regarding goal setting conditions. Different inspectors can have different interpretations of the requirements placed on duty holders. Something that has been deemed compliant or exemplary by one inspector might be deemed unsatisfactory by another. Without explicit standards being set, it is possible that different inspectors would have different goals and that regulation would therefore become totally subjective.

One of the advantages of having standard conditions and associated guidance is that it should improve consistency. We also have stakeholder groups such as the Scottish Non-Nuclear Industries Liaison Groups where this type of issue can be raised.
Yes. Our members appreciated SEPA providing the opportunity to discuss the proposals in an offshore oil and gas workshop, with the ability to address in detail issues arising from the specifics of our operations. It was also useful to clarify the regulatory intention behind the changes, and to understand that other than those highlighted in the consultation document, the intention is to change the way in which authorisations are administered, and that no changes in approach to the operational practicalities of the management of radioactive substances is intended other than in line with BSSD requirements as outlined in the consultation document. Our members indicated at the workshop that they did not foresee a need for additional sector specific guidance, except for the development of a waste plan template for offshore installations. However, if further guidance is to be developed, or changes made to the existing guidance as provided in appendix three of the current consultation, we would participate in that process. Oil & Gas UK are willing to assist with industry engagement on any of the above or related topics should the opportunity arise.
Noted
Seems to be a positive change.