

Notice of revisions to the standard conditions for radioactive substances activities

SEPA has made changes to the standard conditions for radioactive substances activities. We have summarised the key changes below and indicated the types of radioactive substances activity that are affected. Full details of all changes are included in table 1.

We expect that the revised standard conditions (version 1.1) will be published on our website, along with a copy of this notice, on 11 March 2019. We consider all of these changes to be of a minor administrative nature and therefore the revisions will take effect the day following publication. Accordingly, authorisations will be subject to the revised conditions on the date following publication.

We do not consider that any person currently holding an authorisation subject to standard conditions will be affected by these changes.

Key changes

1. Discharging reporting requirements for nuclear sites

This change only affects permits for nuclear sites. We are changing the information that we require nuclear sites to report to SEPA as part of the routine monthly discharge returns. We no longer require that the volume of gaseous waste discharged be included in these reports. We have also updated the wording to make our discharge reporting requirements clearer.

2. Annual reporting of sealed source inventory

This change only affects permits for sealed sources. We are changing the annual sealed source reporting requirement to make to ensure that it includes all sealed sources that are not HASS except IAEA category 5 sources. The previous wording would not have required reporting of Category 2 sources that are not HASS. We have also improved the wording to make it clearer that that report is intended to be a snapshot of the sealed sources held at the end of the calendar year (i.e. on a suitable day in December) by referring to it as an “end of calendar year inventory”.

3. Minor corrections

We are making various typographical changes to the standard conditions. These are minor in nature and do not require any action by any authorised person.

Table 1 Details of the changes to the standard condition for radioactive substances activities

Standard condition	Previous text – version 1.0 (text in bold has been deleted)	New text – version 1.1 (text in bold is added)	Reason for change
A.9.1	If you believe that a requirement of your authorisation is being, has been, or might be contravened, you must inform SEPA by telephone without delay	If you believe that a requirement of your authorisation is being, has been, or might be contravened, you must inform SEPA by telephone without delay.	Typographical change. Full stop added to end of condition.
B.3	Receipt of radioactive waste from another person	Receipt of radioactive waste	Title B.3 changed to reflect that condition B.3.1 is not restricted to receipt of waste from another person.
C.2.1	Before transferring any radioactive substances to another person, you must: a. give to that person a true and accurate description of that substance, and b. confirm that that person agrees to receive them; and	Before transferring any radioactive substances to another person, you must: a. give to that person a true and accurate description of that substance, and b. confirm that that person agrees to receive them.	Typographical change. Unnecessary “and” removed from end of condition.
Interpretation of terms			
EASR	“EASR” means the Environmental Authorisation (Scotland) Regulations 2018;	“EASR” means the Environmental Authorisations (Scotland) Regulations 2018;	Typographical change. Missing “s” added to Authorisation
security plan	“security plan” means a written document made in accordance with the current version of “Security Requirements for Sealed sources” identifying the methods, systems and controls with regards the security of the sealed sources;	“security plan” means a written document made in accordance with the current version of “Security Requirements for Sealed Sources” identifying the methods, systems and controls with regards the security of the sealed sources;	Typographical change. Second “s” in Sealed sources capitalised
treatment	“treatment” includes the recovery of reusable materials or to make the subsequent storage or disposal of the waste more manageable;	“treatment” includes the recovery of reusable materials to make the subsequent storage or disposal of the waste more manageable;	Typographical change. “or” deleted
the Regulations	“the Regulations” means the Environmental Authorisations (Scotland) Regulations 2018;		Definition deleted as term not used in standard conditions

Standard condition	Previous text – version 1.0 (text in bold has been deleted)	New text – version 1.1 (text in bold is added)	Reason for change
WWTW		“WWTW” means waste water treatment works;	Term added as will be commonly used in non-nuclear permits
you	“you” means the Authorised Person ;	“you” means the authorised person ;	Typographical change. Capitalisation removed
your authorisation	“your authorisation” means the permit or registration issued to you in relation to the radioactive substances activity you are carrying-on	“your authorisation” means the permit or registration issued to you in relation to the radioactive substances activity you are carrying on	Typographical change. Hyphen deleted from “carrying-on”
(2) Interpretation of best practicable means	(a) In determining whether particular means are the "best practicable" for the purposes of this Authorisation, you are not required to incur expenditure whether in money, time or trouble which is, or is likely to be, grossly disproportionate to the benefits to be derived from, or likely to be derived from, or the efficacy of, or likely efficacy of, employing them, the benefits or results produced being, or likely to be, insignificant in relation to the expenditure. (b) Where reference is made to the use of "best practicable means" in this Authorisation, the terms “best”, “practicable” and “means” have the following meaning:	(a) In determining whether particular means are the "best practicable" for the purposes of your authorisation, you are not required to incur expenditure whether in money, time or trouble which is, or is likely to be, grossly disproportionate to the benefits to be derived from, or likely to be derived from, or the efficacy of, or likely efficacy of, employing them, the benefits or results produced being, or likely to be, insignificant in relation to the expenditure. (b) Where reference is made to the use of "best practicable means" in your authorisation, the terms “best”, “practicable” and “means” have the following meaning:	Updated to reflect style of standard conditions

Standard condition	Previous text – version 1.0 (text in bold has been deleted)	New text – version 1.1 (text in bold is added)	Reason for change
Schedule 2			
2 nd row of schedule 2 (sealed source reporting)	<p>You must submit a written report to SEPA detailing the sealed sources in IAEA Category 3 & 4 you hold, including:</p> <ol style="list-style-type: none"> 1. Number of sources; 2. The radionuclides contained in the sources; 3. The maximum activity of each radionuclide held; 4. The total activity of each radionuclide held; and <p>The date that the record report to.</p>	<p>You must submit to SEPA, an end of calendar year inventory of the sealed sources you hold, excluding any HASS or IAEA category 5 sources, detailing:</p> <ol style="list-style-type: none"> 1. Number of sources; 2. The radionuclides contained in the sources; 3. The maximum activity of each radionuclide held; 4. The total activity of each radionuclide held; and 5. The date of the inventory. 	<p>We have changed the wording of the reporting requirement to ensure that it includes all sealed sources that are not HASS except IAEA category 5 sources. The previous wording would not have included Category 2 sources that are not HASS.</p> <p>We have also improved the wording to make it clearer that that report is intended to be a snapshot of the sealed sources held by referring to it as an end of calendar year inventory</p> <p>The description in the first column of the 2nd row of table 2 has been updated to reflect these changes.</p>

Standard condition	Previous text – version 1.0 (text in bold has been deleted)	New text – version 1.1 (text in bold is added)	Reason for change
<p>4th row of schedule 2 “permits for a nuclear site”</p> <p>(discharge reporting requirement)</p>	<p>You must submit to SEPA:</p> <ol style="list-style-type: none"> 1. For radioactive waste discharges to the environment, a written summary of the: <ol style="list-style-type: none"> i. The volume discharged; ii. The radioactivity discharged; iii. The total radioactivity of the radionuclides or group of radionuclides discharged during the rolling year and compared to the relevant annual limit. 2. For radioactive waste transferred to another person, a written summary including: <ol style="list-style-type: none"> i. A description of the waste ii. The purpose of the transfer iii. Its volume iv. The total radioactivity v. The name and address of the person receiving the waste <p>You must report the discharges in accordance with joint agencies’ document “Radiological Monitoring Technical Guidance Note 1 Standardised Reporting of Radioactive Discharges from Nuclear Sites”.</p>	<p>You must submit to SEPA, for each calendar month, a written summary of the radioactive waste that you have discharged or transferred. This shall include:</p> <ol style="list-style-type: none"> 1. For radioactive waste you have discharged: <ol style="list-style-type: none"> i. For each disposal limit in your permit, the total radioactivity of the radionuclides or group of radionuclides discharged; ii. The total radioactivity of the radionuclides or group of radionuclides discharged during the rolling year compared to the relevant annual limit; and iii. The volume of aqueous liquid waste discharged. 2. For radioactive waste transferred to another person: <ol style="list-style-type: none"> i. A description of the waste; ii. The purpose of the transfer; iii. Its volume; iv. The total radioactivity; and v. The name and address of the person receiving the waste. <p>You must report the discharges in accordance with joint agencies’ document “Radiological Monitoring Technical Guidance Note 1 Standardised Reporting of Radioactive Discharges from Nuclear Sites”.</p>	<p>The need for nuclear permit holders to routinely report the volumes of gaseous waste discharged was questioned during the consultation prior to issue of new EASR permits.</p> <p>SEPA agreed that reporting this information routinely was unnecessary. Nuclear permit holders would have this information (it is necessary part of calculating the radioactivity discharged) should SEPA need to request this information in the future.</p> <p>Other changes have been made to make it clearer that data is required for each disposal limit in the permit.</p>

Standard condition	Previous text – version 1.0 (text in bold has been deleted)	New text – version 1.1 (text in bold is added)	Reason for change
Schedule 3			
Schedule 3			Various typographical correction including correcting the reference in the 4 th row from B.10.1 to B.9.1
Miscellaneous			
Terms used throughout the document	Standard C onditions H igh A ctivity S ealed S ource	standard c onditions h igh- a ctivity sealed s ource	Some terms are no longer capitalised to be consistent with legislation and permits.