

# OUTLINE OF SEPA'S PROGRAMME OF INSPECTIONS FOR RADIOACTIVE SUBSTANCES ACTIVITIES

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We call this **One Planet Prosperity**

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03000 99 66 99

Strathallan House, Castle Business Park, Stirling, FK9 4TZ

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## Introduction

The Scottish Environment Protection Agency (SEPA) is responsible for regulating radioactive substances under the Environmental Authorisations (Scotland) Regulations 2018 (EASR).

Part of how we regulate is to inspect authorised persons so that we can assess whether they are complying with the relevant rules and conditions placed upon them by their authorisation. To do this, we have a programme of inspections for radioactive substances activities that follows a graded approach depending on the magnitude of the radiological hazards, risks and compliance history.

This document outlines our inspection programme for radioactive substances activities and we will periodically report on the main findings of our inspection programme.

## General aspects of the inspection programme

This outline inspection programme provides an indication of the planned inspection frequency for each type of radioactive substances activity that is authorised. The inspection frequency is based on several factors including:

- the potential magnitude and nature of the hazard associated with each type of radioactive substances activity; and
- the general level of compliance with EASR and any rules or conditions imposed by the authorisation.

We may increase the frequency of inspection if the authorised person has a history of non-compliance or if there are other factors that we consider make this necessary.

For the purpose of this programme, inspections include both site inspections and desk-based inspections. The majority of inspections that we carry out will be announced (i.e. planned in advance with the authorised person), as this is more productive for us and less disruptive for the authorised person. However, we retain the ability to carry out unannounced inspections if there is a regulatory benefit from doing so.

This inspection programme is about planned inspections, but we may also carry out reactive inspections if required in response to, e.g. an incident, non-compliance or other regulatory intelligence or emergent issues.

We do not routinely inspect activities carried on under general binding rules or subject to notification.

## Inspection programme for registrations

There are currently two radioactive substances activities which are authorised by registration; each has a different inspection requirement.

**Outwith Scotland:** where the authorised person is permanently based in another part of the UK but may carry out work from time to time in Scotland for no longer than four months at a time. We plan to carry out an annual desk based inspection. When we are informed of the intention to bring a source into Scotland, we may carry out a site inspection.

**Non-Nuclear:** authorised persons who use very small amounts of radioactivity in unsealed form and transfer their waste to another person or dispose of it in accordance the standard conditions. A site based inspection should be carried out every two years and a desk based inspection should be considered for the intervening year.

## Inspection programme for permits

Authorisation by permit is for higher risk activities and those that need technical assessment and/or involve a consultation process. There are four types of permit:

**High-activity sealed radioactive sources (HASS):** for both fixed and mobile HASS a site inspection should be carried out on annually.

**Non-HASS sealed sources:** for sealed sources that are not HASS and are not authorised under GBRs site inspections should be carried out annually for mobile sources and those sources in IAEA category 2 or above. Site inspections for sources in IAEA category 3 and below should be carried out every two years. A desk-based inspection may be carried out in the intervening year.

**Non-nuclear:** for authorised persons, not on a nuclear site, who manage larger amounts of unsealed sources an annual site inspection should be carried out.

**Nuclear:** nuclear sites including the Dounreay Low Level Waste Facility but excluding MoD sites should be inspected up to five times per year.

## Themed inspections

SEPA may periodically carry out themed inspections. Such inspections will focus on a particular area of compliance with an authorisation. They may be targeted at a specific group of authorised persons or activities or span across all. On occasion, themed inspections may be carried out in conjunction with other regulators where there are areas of common interest.

## Offshore inspections

EASR does not currently extend to offshore premises. Regulation of radioactive substances offshore is carried out under Radioactive Substances Act 1993. Offshore locations generally present lower risks to the public and the environment and offshore inspections present logistical challenges. Consequently SEPA's inspection focus is on carrying out desk-based inspections and on relevant onshore site inspections. The latter may include inspection of waste and contaminated items sent on shore and the review of information at onshore offices. Typically, an offshore installation will be subject to a desk-based assessment once every 5 years as a minimum. Installations sending waste and contaminated items for processing onshore will be subject to an onshore inspection every 2 years. SEPA may carry out offshore inspections where warranted.

## Summary of planned EASR inspections

Authorisation type	Radioactive substances activity	Frequency of inspection
GBRs and notification	All	None
Registration	All	Annual
Permit	Non-nuclear	Annual
Permit	Nuclear	Five times per year