



**RADIOACTIVE SUBSTANCES ACT 1993
APPLICATIONS GUIDANCE
FOR
SEALED SOURCE REGISTRATION FORM**

Contents

Introduction	2
Application Fees	2
Submission of application and Duly Made checks	2
Consultation	3
Front Page and Section 1	4
Section 1 – General Information.....	4
Section 2 – Application Details.....	7
Section 3 – Additional Information.....	12

Introduction

This guidance note relates to SEPA's sealed source registration application form, which will allow you to apply for a new registration, a variation to an existing registration or to cancel your registration. SEPA would expect that the amount and detail of the information submitted would be proportional to the complexity of the proposed application.

Please note that this application form does **NOT** cover registrations relating to the keeping or use of unsealed radioactive material or authorisations relating to the accumulation or disposal of radioactive waste. For applications of this nature, please complete SEPA's Radioactive Substances modular application form available on SEPA's website.

Application Fees

Most types of application will be required to be accompanied by the appropriate application fee. For more information on the relevant application fees and accepted payment methods, please refer to the Radioactive Substances Fees and Charges Scheme for the current year which is published on SEPA's website. Please note SEPA cannot progress an application until the relevant fee has been paid. Payment can also be submitted online via the Applications page on the SEPA website using web payment facility.

Submission of application and Duly Made checks

If you are printing out the form to fill in by hand, please use black ink and ensure that all information provided is legible. Further information may be submitted on additional sheets and/or reports. These must be clearly marked with the name and address of the applicant. Applications that are incorrect or incomplete may be deemed not to be Duly Made.

Due to the COVID-related office access restrictions please do not post your application. Once you have completed the application form please save it to your computer and send a copy, along with proof of payment and any supporting documentation to registry@sepa.org.uk

SEPA will check the application to ensure that it is Duly Made, and notify you of the outcome, normally within two weeks of receipt of an application. If an application has been deemed not to be Duly Made, the application form and fee will be returned to you along with an explanation of why it is not Duly Made. For an application to be Duly Made, it must be:

1. Submitted on the correct application form.
2. Accompanied by the appropriate fee.
3. Signed by a relevant person authorised to sign on behalf of the applicant's organisation.
4. All relevant sections/questions have been completed.
5. All supporting documentation has been included.

Applicants should normally allow up to 4 months from the date an application is deemed Duly Made for the application to be determined.

Please note that by making an application you are not guaranteed to be granted a permit. SEPA reserves the right to determine the application which may result in the application being refused. If refused, SEPA will write to you to explain the reasons for the refusal and provide details of how to appeal SEPA's decision.

Furthermore, you have the right to withdraw your application at any time. Should you wish to withdraw your application, you must write to SEPA to request it. SEPA will acknowledge your request in writing.

Consultation

In accordance with the High-activity Sealed Radioactive Sources and Orphan Sources Regulations 2005, SEPA is required to consult with the police on site security for all sources not falling into Source Category/Security Group 5D. This process may take up to 6 weeks to complete. The police may visit the site, or in the case of mobile radioactive apparatus, the place where it is usually kept as part of the consultation. This visit may or may not involve SEPA.

Front Page and Section 1

This section is applicable to all applications made on this form.

Which one of the following applications are you making?

Please indicate which type of application is being made by ticking the appropriate box. Please use one form for each type of application. List all relevant certificates under the Radioactive Substances Act 1993 (RSA93) which are currently held by the applicant. Give a brief explanation of why you are seeking to apply (e.g. variation to increase number of nuclear density gauges held).

In addition, list all other SEPA permits that apply to the site, or in the case of mobile radioactive apparatus, the place where it will usually be kept. Other SEPA permits include those made under the Pollution Prevention and Control Regulations (PPC), the Water Environment (Controlled Activities) Regulations (CAR) and the Waste Management Licensing Regulations (WML).

Section 1 – General Information

Name of Site

1a Please provide details of the premises to which this application refers

Please provide the address of the site where the radioactive material will be kept or used, including its post code and the main telephone of the site (e.g. reception).

For mobile radioactive apparatus registration applications, this address would be the one where the registered sealed sources are usually kept, including those usually kept in other parts of the UK or elsewhere.

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

The permit must be sent to the registered/principal address in accordance with Section 41 of RSA93, however if you require an additional copy to be sent to an alternate address please specify the details in writing.

1b Please state the local government area in which the premises are situated

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

For mobile radioactive apparatus registration and all offshore registration applications this information is **NOT** required.

1c Please give the grid reference of the main entrance to the premises

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

Legal Status of Applicant

1d Please describe the applicant's undertaking

Please provide a description of the applicant's undertaking. "Undertaking" is defined in Section 47 of RSA93 as follows:

"includes any trade, business or profession, and, in relation to a public or local authority, includes any of the powers or duties of that authority, and, in relation to any other body of persons, whether corporate or unincorporated includes any of the activities of that body".

The undertaking is not the same as the purpose for which the applicant has registered sealed sources. For example, a firm may have its undertaking described as "light engineering works" whilst the reason for the registered sealed sources being on site may be liquid level detection as part of a gauge.

SEPA would prefer to use the applicant's Standard Industrial Classification (SIC) description as the description of its undertaking. For companies registered in the UK this information can be obtained from Companies House of the Office of National Statistics (www.companieshouse.gov.uk).

1e Please indicate what the legal status of the applicant is by selecting one option from the drop down menu

Any Registration, Notice of Variation or Notice of Cancellation issued by SEPA is a legally binding document. Therefore, it is imperative that you are correctly described in legal terms on the front sheet to the permit or notice.

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

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

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

Organisation of individuals may be a club or similar organisation. In those circumstances where there are more than 1 individual involved, please use separate sheets to complete the same information and note these sheets under section 3a.

Applicant Contact Details

1f. Please provide details about the person that we may contact about the application

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

1g. Please provide details about the site contact or responsible person if different from the person above

This is the person who has the direct management of the registered sealed sources on the site (e.g. Radiation Protection Officer or Radiation Protection Supervisor), usually on a day-to-day basis. This is usually the person with whom SEPA would ask for if undertaking an inspection. It may be the same person as listed under 1f above.

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

The granting of a registration will attract an annual subsistence fee as set out in the Radioactive Substances Fees and Charges Scheme for the current year, available from SEPA's website. This section identifies where any invoices from SEPA should be sent.

Section 2 – Application Details

Details of the registered sealed sources to be kept and used

“Radioactive material” has the same meaning as the Radioactive Substances Act 1993 Amendment (Scotland) Regulations 2011. “Sealed sources” mean a radioactive source containing radioactive material where the structure is designed to prevent, under normal use, any dispersion of radioactive substances, excluding such a source where it is an electrodeposited source or a tritium foil source. “Mobile radioactive apparatus” means any apparatus, equipment, appliance or other thing which is radioactive material and is constructed or adapted for being transported from place to place.

2a. Please state for what justified practice you will be using the registered sealed sources

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

A list of justified practices can be obtained from:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/256253/justification-guidance.pdf

Annex 3 of The Justification of Practices Involving Ionising Radiation Regulations 2004, lists the justified practices.

Also, the Justification Register contains further updates:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/345740/Justification_Application_Centre_-_Register_-_2014_-_07.pdf

2b. Please provide details in the table below of the registered sealed sources to be kept or used

Please complete the table with the sealed sources you intend to keep and use:

- ‘Radionuclide’ - state the full name of the element followed by the mass number of the isotope (e.g. ‘Caesium-137’);
- “Maximum Number” – state the maximum number of registered sealed sources containing that radionuclide you intend to keep or use. It is recommended that if the registered sealed sources require to be replaced frequently and the replacement is unlikely to occur on the same day that the replacement source arrives on your site that consideration is given to increasing the maximum number of sources to be kept. Additionally, if there is a likelihood that the number of sealed sources required will

increase in the near future (within 12-18 months) then it may be best to apply for the total number required rather than immediate/current usage;

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

For variations, it is only necessary to complete the table where you intend to hold new radionuclides or where there is a proposed change in the number/activity/purpose of an existing radionuclide. All registered sealed sources must be listed, including those already appearing on an existing registration in order to avoid confusion on what is to be registered. In such cases it may be necessary to provide additional information on a separate sheet and list it under 3a.

2c. Please provide details in the table below of the location where the registered sealed sources will be kept or used

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

- "Building or location name or number" – State the name or number of the location where the sealed source(s) will be kept or used (e.g. bottling plant area, Room 223, etc.).
- "Radionuclide" - State the full name of the element followed by the mass number of the isotope (e.g. 'Caesium-137'). If registered sealed sources containing the same radionuclide are used in separate locations, please ensure that all locations where those sources are used are listed; and

- “Total Activity [Bq]” – State the total activity of all sealed sources containing that particular radionuclide in that particular location in Becquerels or multiples thereof (e.g. kBq, MBq, GBq). If there are multiple locations where registered sealed sources are kept or used, please ensure that all locations have been listed.

For variations, it is only necessary to complete the table where you intend to hold new radionuclides or where there is a proposed change in where existing radionuclides will be kept. All registered sealed sources must be listed, including those already appearing on an existing registration in order to avoid confusion on what is to be registered. In such cases it may be necessary to provide additional information on a separate sheet and list it under 3a.

2d. Please provide details in the table below of any depleted uranium being kept or used in association with the registered sealed sources

If there are any items incorporating depleted uranium associated with the keeping or use of the registered sealed sources, SEPA requires to know the following information:

- “Type of item incorporating depleted uranium” – State the type of item. For example, transport container, shielding, collimator, etc.;
- “Total number of items incorporating depleted uranium” – State the number of items of that particular type that will be kept. For example, transport containers - 3, collimator - 1;
- “Total mass of items incorporating depleted uranium” – State the total mass in kilogrammes (kg) for each different type of item. For example, transport containers - 50.4 kg, collimator - 5 kg; and
- “Location of items incorporating depleted uranium” – As for 2c above, state the location of the items incorporating depleted uranium. For example, transport containers and collimator - equipment storage locker.

For variations, it is only necessary to complete the table where you intend to hold a different type of item incorporating depleted uranium, more items, increase the mass held or where there is a proposed change in where the items will be kept. All items incorporating depleted uranium must be listed, including those already appearing on an existing registration in order to avoid confusion on what is to be registered. In such cases it may be necessary to provide additional information on a separate sheet and list it under 3a.

Movement of registered sealed sources

The purpose of this section is to establish whether registration under section 7 or section 10 of RSA93 is more appropriate. “Mobile radioactive apparatus” means any apparatus,

equipment, appliance or other thing which is radioactive material and is constructed or adapted for being transported from place to place.

2e. Do you intend to move the registered sealed sources from the premises?

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

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

- The frequency and duration that the mobile radioactive apparatus will be away from the place where is normally kept;
- The manner in which the mobile radioactive apparatus will be transported; and
- Control measures, including registered sealed source security, when the mobile radioactive apparatus is away from the place where it is normally kept.

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

2f. Do you intend to lend or hire the registered sealed sources?

If it is your intention to lend or let on hire the registered sealed sources (or the device in which they are contained - the mobile radioactive apparatus), you should tick the “yes” box and provide further details of this activity in the space given.

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

- The management arrangements for ensuring that the person to whom the mobile radioactive apparatus is being lent or let on hire is appropriately registered/permitted;
- The manner in which the mobile radioactive apparatus will be transported; and
- The manner in which the mobile radioactive apparatus will be stored when not in use.

Please note that the person to whom you lend or let on hire your mobile radioactive apparatus must also have his own registration to keep and use sealed sources of the type he has been given as well as having enough registered number of sources on his registration to accommodate his own mobile radioactive apparatus as well as any he may be lent or let on hire.

In addition, if that person intends to transport the mobile radioactive apparatus outside of Scotland for work in other parts of the UK, he will also be required to hold an appropriate

permit from the EA (for England and Wales) or an appropriate registration from the NIEA (for Northern Ireland).

End of Life

2g. Please state what you intend to do with the registered sealed sources at the end of life

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

The most common approach is to plan to dispose of the source(s) in accordance with the Radioactive Substances Exemption (Scotland) Order 2011, as amended.

Safe management of high activity source(s) (HASS)

2h. Please provide details of the arrangements for the safe management of any registered sealed sources that are also High-activity sources (HASS)

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

Examples of suitable arrangements include:

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

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

Section 3 – Additional Information

Supporting Documents and Attachments

3a Please list any and all supporting documents or additional pages supplied

In this section, SEPA expects the following information to be included with the completed application form:

- In most cases, one site plan showing the location of the site in relation to its surroundings. The site plan must also delineate the site boundary by marking this clearly in red. It would be preferred if no other markings on the plan were in red other than the site boundary. The site plan scale must be sufficient to allow the location to be identified and a clear distinction to be made between the site and surrounding premises. For sites which contain multiple buildings where registered sealed sources are kept (e.g. university campus), the site boundary must encompass only those buildings where the sources are kept or used and exclude areas such as car parks and other public areas;

Note: a site plan will **NOT** be required for the following applications:

- mobile radioactive apparatus registrations;
 - cancellations;
 - variation where this is no change to the site boundary; or
 - for offshore installations.
- For cancellations SEPA expects to receive copies of all transfer or disposal records relating to the Registered Sources. Please refer to the 'Guidance on Decommissioning of Non-Nuclear Facilities' document on SEPA's website for further information.
 - If applicable, a list of the additional sheets and/or other supporting information that has been attached to the application. All separate sheets must be clearly marked with the name and address of the applicant.

National Security and Trade Secrets

3b Please inform us about any National Security or Commercial in Confidence Claim

National Security - under the Radioactive Substances (National Security) (Scotland) Certificate and Direction 2009, SEPA must not include information relating to applications or registrations under section 7 or 10 of RSA93 in registers of information made accessible to the public. In keeping with this Direction, SEPA considers all completed sealed source

registration application forms to fall within the scope of the Direction and will deal with such information accordingly.

SEPA would urge all applicants and their agents to be aware of the sensitivity of the information contained within the application and to take suitable precautions to prevent the loss or theft of that information. Information security will be a requirement of the registration. If you have any queries on how this information should be handled, the applicant is urged to contact SEPA at the earliest opportunity.

Although SEPA considers a completed application to fall within the scope of the Direction and will not place it on the public register, there is a possibility that knowledge of the application or its contents may have other National Security implications. If you believe this to be the case, tick the “yes” box, but do not write anything else on the application form. You should contact SEPA before submitting the application to discuss the requirements for determining such a claim.

Trade Secrets - you may claim that your application includes information that needs to be protected on the grounds of it being a trade secret or commercially confidential. If you believe there is any information in your application that should be kept from the public register for reasons of it being a trade secret (in addition to it being excluded from the public register by dint of the National Security Direction), please tick the “yes” box, but do not write anything on the application form that reveals this information. You should contact SEPA before submitting the application to discuss the requirements for determining such a claim.

Remittance Information

3c Please provide payment details for application fee

Most applications will attract an application fee, although some applications will not. For more information on the fee (or the reason why no fee is required) and the acceptable means of paying, please refer to the Radioactive Substances Fees and Charges Scheme for the current year which is available from SEPA’s website. If you have any doubt, please contact SEPA before submitting the application.

On the application, please indicate whether your application requires a fee (if not, why), the amount paid and the method of payment used.

Declaration

This section must be signed by a person that is authorised to sign on the applicant’s behalf.

If the declaration is being signed by someone outside of the applicant's organisation, he/she will also need to provide written evidence that they have been authorised to sign in that capacity.

Any person named on the application form, such as under 1e, 1f, 1g or 1h should be informed that they have been so named and the contents of SEPA's Data Protection Notice made known to them.