

**RSA93 NON-NUCLEAR AUTHORISATIONS - OFFSHORE ONLY**

<b>ENVIRONMENTAL LIMITS</b>							
<b>ELC Parameter</b>	<b>Typical authorisation condition #</b>	<b>Data source</b>	<b>No breaches</b>	<b>Minor breach(es) or minor environmental event(s)</b>	<b>Repeated minor breaches</b>	<b>Gross Breaches</b>	<b>Significant breach(es)</b>
<b>Scope ELCs</b>							
Undertaking and Authorised Premises	1.1.1, 1.2.1	Inspection	Compliant with authorisation	N/A	N/A	N/A	Authorised activities occurring outwith Authorised Premises
Authorised accumulation and disposal routes	2.3.1, 3.1.1, 3.2.1, Table 3.1	Inspection & waste return	Compliant with authorisation	N/A	N/A	N/A	Unauthorised waste disposal route used, unauthorised waste accumulated or causes Category 1 (major) or Category 2 (significant) environmental event
<b>Numeric ELCs</b>							
Authorised disposal limits	4.1.3 Table 4.1	Inspection & waste return	Compliant with authorisation	N/A	N/A	Any exceedance of limit	Causes Category 1 (major) or Category 2 (significant) environmental event
Liquid disposal limits (marine environment)	5.1.3	Inspection & waste return	Compliant with authorisation	N/A	N/A	Any exceedance of limit	Causes Category 1 (major) or Category 2 (significant) environmental event
<b>Process ELCs</b>							
Authorised disposals	4.1.1, 4.1.2	Inspection	Compliant with authorisation	N/A	N/A	Any exceedance of limit	Causes Category 1 (major) or Category 2 (significant) environmental event
Authorised marine discharge system (liquid waste)	5.1.1	Inspection	Compliant with authorisation	N/A	N/A	Unauthorised marine discharge system used	Causes Category 1 (major) or Category 2 (significant) environmental event
Authorised liquid waste not prohibited or prevent for disposal (e.g. non-radiological)	5.1.2	Inspection	Compliant with authorisation	N/A	N/A	Liquid waste prohibited from disposal for reasons other than activity	Causes Category 1 (major) or Category 2 (significant) environmental event
Only specified waste type disposed of to Named Person	6.1.1	Inspection & waste return	Compliant with authorisation	N/A	N/A	Unauthorised waste disposed to Named Person	Causes Category 1 (major) or Category 2 (significant) environmental event
Only specified waste type transferred to Authorised Person	6.1.2	Inspection & waste return	Compliant with authorisation	N/A	N/A	Unauthorised waste disposed to Named Person	Causes Category 1 (major) or Category 2 (significant) environmental event
<b>Numeric statistical ELCs</b>							
none specified							

## ENVIRONMENTAL MANAGEMENT CONDITIONS

EMC Attribute	Authorisation condition #	Data source	Compliant	Minor non-conformance	Major non-conformance	Comments
<b>MANAGEMENT</b>						
Permit implementation plan	8.1.1	Inspection	All improvements/ actions completed satisfactorily and to timescale.	Most specified improvements completed. All improvements completed, but not to timescales.	No specified improvements completed.	May not be specified in certificate
Managerial structure/commitment	2.7.1	Inspection	Defined management structure with evident organisational commitment to compliance. Clearly identified responsible person.	Some organisational commitment to compliance. Responsible person not formally recognised.	No organisational commitment to certificate compliance. No clearly identified responsible person.	
Staffing	2.6.1, 2.6.2	Inspection	RWAs appointed and recognised by SEPA. Demonstration that RWAs have been consulted on all significant disposal issues.	RWAs appointed, but consultation with them is haphazard. RWAs advice is only partially considered.	RWA not appointed or not recognised by SEPA. No consultation with RWA.	
Best Practicable Means	2.1.1, 2.1.2, 2.2.1, 2.2.1.1, 2.2.1.2, 2.8.2	Inspection	BPM is fully documented for all aspects of certificate requirements	BPM has not been recorded or justified but is being implemented adequately or BPM described and implemented on most aspects of certificate requirements	No written description of what constitutes BPM and/or failure to implement BPM on significant number of certificate requirements	
Monitoring control systems/procedures	2.3.2, 2.3.5, 2.5.1, 2.8.1, 2.11.1, 6.1.2	Inspection	Formalised system for ensuring waste is disposed of regularly. Accumulation capacity of facility never approached. Effective written procedures available and implemented. No deviations from procedures. Samples et al sufficient to demonstrate compliance and are fully recorded. Results used to inform monitoring programme.	Informal or haphazard method to ensure waste is disposed of regularly. Accumulation capacity of facility is routinely approached. May require prompt from SEPA to initiate disposal. Procedures incomplete, but most key area covered. Some deviations from procedures. Incomplete samples et al to fully demonstrate compliance. Samples et al undertaken but not adequately recorded.	No consistent method for ensuring waste is disposed of. Accumulation capacity of facility routinely compromised. Requires external prompt to initiate disposal. No/inadequate written procedures or instructions. Procedures routinely not followed. No/inadequate samples et al undertaken. Samples et al do not demonstrate compliance.	May also include conditions relating to an environmental monitoring programme, if specified in the certificate.
Emergency response procedure/accident response/response to incident (short term)	2.3.11, 2.3.12, 2.3.13, 6.1.5, 6.1.6	Inspection	In the event that waste is unintentionally dispersed, lost or stolen, all reasonable actions are taken in a prompt manner to contain the dispersal or retrieve the waste. Waste which is disposed of by transfer and is subsequently found to be outwith the receiving site's authorisation is returned to the Authorised Premises forthwith.	In the event that waste is unintentionally dispersed, lost or stolen, not all reasonable actions have been taken to contain the dispersal or retrieve the waste or reasonable actions have been taken but not in a prompt manner. Waste which is disposed of by transfer and found subsequently to be outwith the receiving site's authorisation is returned to Authorised Premises after an avoidable delay.	In the event that waste has been unintentionally dispersed, lost or stolen, insufficient steps have been taken to contain the dispersal or retrieve the waste and/or only after an unreasonable delay. Where waste has been disposed of by transfer and is subsequently found to be outwith the receiving site's authorisation, no attempt made to have the waste returned.	The Authorisation Holder may not experience any events of this nature.

PLANT & INFRASTRUCTURE						
Condition and operation of plant, equipment and infrastructure	2.3.3, 2.3.4, 2.3.6, 2.3.8, 2.3.9, 2.3.10	Inspection	All waste/ containers clearly marked to indicate radionuclide content, activity and reference. All areas where waste is stored are marked with trefoil/wording to indicate the presence of radioactive waste. All reasonable measures have been take to prevent unauthorised access tot he waste. Radioactive waste is segregated from non-radioactive waste in a manner to prevent the spread of any contamination.	Some waste/ container's markings are illegible or do not contain sufficient information. Areas where waste is stored insufficiently or improperly marked. Not all reasonable measures have been taken to prevent unauthorised access to the waste. Insufficient measures taken to segregate radioactive and non-radioactive waste and prevent possible cross-contamination.	Waste/ containers not identified or illegibly marked. Areas where waste is stored not identified or illegibly marked. No/very poor measures taken to prevent unauthorised access to the waste. No attempt to segregate radioactive from non-radioactive waste or measures taken to prevent the spread of contamination in the event of spillage.	
Monitoring equipment	2.4.4	Inspection	Formal programme in place to ensure that relevant measuring instruments are appropriate for the types of radionuclides used and that the instruments are serviceable and correctly used by staff	No demonstration that measuring instruments are appropriate for the types of radionuclides in use and/or that they are serviceable or correctly used by staff.	Measuring instruments are not appropriate for the types of radionuclides in use, are not serviceable or routinely available and/or staff do not use them correctly	
Maintenance of processes, plant and installation to relevant standards	2.3.7, 2.4.1	Inspection	All areas where waste is being stored can be easily decontaminated in the event of spillage. Effectiveness of all equipment and infrastructure used in conjunction with waste checked regularly and results recorded. Deficiencies noted are corrected as soon as reasonably practicable.	Areas where waste is being stored cannot be easily decontaminated in the event of spillage. Incomplete checking of all equipment and infrastructure associated with the waste. Failure to record results of checking.	Areas where waste is being stored is not designed or adapted for the containment of spillages or to be easily decontaminated. No checking of effectiveness of equipment and/or infrastructure associated with the waste undertaken.	
Implementation of monitoring/testing/calibration programmes	2.4.2, 2.4.3	Inspection	All relevant measuring instruments regularly calibrated to an appropriate standard with certificates available to demonstrate this. Formal, written arrangements in place and implemented for acceptance of all systems and equipment associated with the waste.	Incomplete programme of calibration. Calibration certificates not available. Arrangements/criteria for acceptance into service are not formally recorded, but are being implemented. Formal, written arrangements do not exist for some systems/ equipment associated with the waste.	No/inadequate calibration of equipment. No/inadequate arrangements for acceptance into service.	
REPORTING + RECORDING						
Record keeping	2.9.1, 2.9.2, 2.9.2.1, 2.9.2.2, 2.9.3, 6.1.4, 6.1.4.1, 6.1.4.2	Inspection	True, accurate and legible records maintained. Records kept in a manner to demonstrate compliance with authorisation.	Data recorded but not kept in a manner to demonstrate compliance with authorisation.	Limited or non-existent records. Failure to record all data required by authorisation.	
Information and records available as required by licence	2.5.2	Inspection	All information/ records relating to authorisation, including procedures, are easily accessible during inspection.	Key information/ records available, but supporting information is not readily available.	Key information/ records not available.	
Reports to SEPA required under licence	6.1.3, 6.1.3.1, 6.1.3.2, 6.1.3.3, 7.1.1	Data source	Annual waste returns, utilisation of new disposal route(s) made in the manner specified by the authorisation/SEPA within specified deadlines.	Report(s) does not include all required data, is not made in the manner specified by the authorisation/SEPA or is late.	Reports not made in accordance with the authorisation.	This data may include environmental monitoring results if this is specified in the authorisation.

Notification of incidents	2.10.1, 2.10.2, 2.10.3, 2.10.4, 2.10.4.1, 2.10.4.2, 2.10.4.3, 2.10.5, 2.10.6, 2.10.7, 2.10.8, 2.10.9, 2.10.9.1, 2.10.9.2, 2.10.9.3	Data source	All notifications made to SEPA as specified in the authorisation.	Notifications made to SEPA are incomplete or made after delay.	Notifications not made to SEPA in manner specified in authorisation.	There may not be any cause to notify SEPA.
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