

**RSA93 SEALED SOURCE REGISTRATIONS - OFFSHORE ONLY**

<b>ENVIRONMENTAL LIMITS</b>							
<b>ELC Parameter</b>	<b>Typical registration 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 Registered Premises	1.1.1, 1.1.2	Inspection	Compliant with registration	N/A	N/A	N/A	Keeping/use of radioactive material outwith Registered Premises
Registered radionuclides	2.1.1, Table 2.1	Inspection	Compliant with registration	N/A	N/A	N/A	Keeping/use of unregistered radionuclide
Purpose for each source	2.1.1, 2.1.4, Table 2.1	Inspection	Compliant with registration	N/A	N/A	N/A	Use of source for purpose not listed in registration
Items incorporating DU	2.2.1, Table 2.2	Inspection	Compliant with registration	N/A	N/A	N/A	Incorrect description of physical form of DU item.
<b>Numeric ELCs</b>							
Maximum number of sources	2.1.1, Table 2.1	Inspection	Compliant with registration	N/A	N/A	Any exceedance of limit	Causes Category 1 (major) or Category 2 (significant) environmental event
Maximum quantity of radioactivity in any source	2.1.2, Table 2.1	Inspection	Compliant with registration	any breach up to and including 10% of licenced limit	4 or more minor breaches	Exceed limit by greater than 10%	Causes Category 1 (major) or Category 2 (significant) environmental event
Maximum quantity of radioactivity in all sources	2.1.2, Table	Inspection	Compliant with registration	any breach up to and including 10% of licenced limit	4 or more minor breaches	Exceed limit by greater than 10%	Causes Category 1 (major) or Category 2 (significant) environmental event
Maximum number of DU items	2.2.1, Table 2.2	Inspection	Compliant with registration	N/A	N/A	Any exceedance of limit	Causes Category 1 (major) or Category 2 (significant) environmental event
Maximum mass of all DU items	2.2.2, Table 2.2	Inspection	Compliant with registration	any breach up to and including 10% of licenced limit	4 or more minor breaches	Exceed limit by greater than 10%	Causes Category 1 (major) or Category 2 (significant) environmental event
<b>Process ELCs</b>							
none specified							
<b>Numeric statistical ELCs</b>							
none specified							

## ENVIRONMENTAL MANAGEMENT CONDITIONS

EMC Attribute	S7 registration condition #	S10 registration condition #	Data source	Compliant	Minor non-conformance	Major non-conformance	Comments
<b>MANAGEMENT</b>							
Permit implementation plan	6.1.3, 7.1.1	5.1.3, 6.1.1	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
Best Practicable Means	3.1.1	2.2.1	Inspection	No unnecessary radioactive waste is generated as a result of the keeping or use of the registered substances.	Not all practicable measures have been taken to prevent the unnecessary generation of radioactive waste.	No/ inadequate measures taken to prevent the generation of unnecessary radioactive waste. Significant generation of unnecessary radioactive waste despite any measures taken.	
Monitoring control systems/procedures	3.1.3, 3.1.4, 3.1.1.2, 3.3.1, 4.1.1, 4.1.2, 4.3.2, 6.1.1.3, 6.1.1.3.1, 6.1.1.3.2, 6.1.2	2.2.3, 2.2.4, 2.2.12, 2.4.1, 3.1.1, 3.1.2, 3.3.2, 5.1.1.3, 5.1.1.3.1, 5.1.1.3.2, 5.1.2	Inspection	Sources have not been modified or mutilated. Formalised security system to prevent unauthorised access, loss or theft of registered substances, including site security plans, if required. Effective written procedures available and implemented. No deviations from procedures. Adequate financial provision in place for HASS.	Insufficient measures in place to prevent modification or mutilation of sources. Informal security system to prevent unauthorised access, loss or theft. Site security plans incomplete or lacking sufficient detail. Procedures incomplete, but most key areas covered. Some deviations from procedures. Inadequate financial provision for HASS.	No security system in place to prevent unauthorised access, loss or theft. Sources have been modified or mutilated. No/inadequate written procedures or instructions. Procedures routinely not followed. No financial provision in place for HASS.	
Emergency response procedure/accident response/response to incident (short term)	3.1.9, 3.1.11	2.2.10, 2.2.13	Inspection	In the event that a source is found to be leaking, lost or stolen, all reasonable actions are taken in a prompt manner to contain the dispersal or retrieve the material.	In the event that a source is found to be leaking, lost or stolen, not all reasonable actions have been taken to contain the dispersal or retrieve the material or reasonable actions have been taken but not in a prompt manner.	In the event that a source is found to be leaking, lost or stolen, insufficient steps have been taken to contain the dispersal or retrieve the material and/or only after an unreasonable delay.	The Registered Person may not experience any events of this nature.
<b>PLANT &amp; INFRASTRUCTURE</b>							
Condition and operation of plant, equipment and infrastructure	3.1.2, 3.1.5, 3.1.8, 3.1.10, 3.2.1, 4.3.1	2.2.2, 2.2.5, 2.2.28, 2.2.11, 2.3.1, 3.3.1	Inspection	All areas suitably marked with trefoils and other signage. All reasonable measures taken to prevent unauthorised access to the sources/ MRA as well as damage due to fire, corrosion, explosion or other hazard. Each source/ MRA assigned a unique identifier. Immediate housing or container of source/ MRA legibly and robustly marked with unique identifier, radionuclide and activity.	Most areas marked or signed, but some omissions or illegible signage. Not all reasonable measures taken to prevent unauthorised access to the sources/ MRA or prevent damage due to fire, corrosion, explosion or other hazard. Markings on immediate housing or container of source/ MRA not legible, not robustly marked or does not include unique identifier, radionuclide and activity.	No/inadequate signage on areas. No/very poor measures taken to prevent unauthorised access to the sources/MRA or prevent damage due to fire, corrosion, explosion or other hazard. No markings on immediate housing or container of source/MRA.	

Maintenance of processes, plant and installation to relevant standards	3.1.6, 3.1.7, 6.1.1, 6.1.1.1, 6.1.1.2, 6.1.1.2.1, 6.1.1.2.2, 6.1.1.4, 6.1.1.4.1, 6.1.1.4.2	2.2.6, 2.2.7, 2.2.9, 2.5.5, 5.1.1, 5.1.1.1, 5.1.1.2, 5.1.1.2.1, 5.1.1.2.2, 5.1.1.4, 5.1.1.4.1, 5.1.1.4.2	Inspection	All sources/MRA kept in good repair with regular wipe testing undertaken. Location of sources/MRA verified at regular intervals and checks recorded. Physical aspects of site security, such as alarm and detection equipment, installed and maintained in accordance with the site security plan. Adequate measures in place, implemented and regularly reviewed to ensure the physical security of the sources/MRA. MRA's kept in a secure store when not in use and accompanied by copies of the registration and relevant procedures at all times.	All sources/ MRA appear in good repair, but wipe testing is not undertaken regularly. Location of sources/ MRA undertaken not verified at regular intervals and checks not recorded. Not all items of physical site security has not been installed or maintained as specified in the site security plan. Measures not fully adequate, not fully implemented or regularly reviewed. MRA kept securely when not in use but not accompanied by copy of the registration and/or relevant procedures.	Sources/ MRA not maintained in good repair. Location of sources/ MRA not verified when not in use. The majority of physical site security items in the site security plan have not been installed or maintained. No/ Inadequate measures in place. MRA not kept securely when not in use.	
<b>REPORTING + RECORDING</b>							
Record keeping	3.4.1, 3.4.1.1, 3.4.1.2, 3.4.1.3, 3.4.1.4, 3.4.1.5, 3.4.1.6, 3.4.1.7, 3.4.4, 4.2.1	2.5.1, 2.5.1.1, 2.5.1.2, 2.5.1.3, 2.5.1.4, 2.5.1.5, 2.5.1.6, 2.5.1.7, 2.5.1.8, 2.5.1.9, 2.5.4, 3.2.1	Inspection	True, accurate and legible records maintained. Records kept in a manner to demonstrate compliance with registration.	Data recorded but not kept in a manner to demonstrate compliance with registration.	Limited or non-existent records. Failure to record all data required by registration.	
Information and records available as required by licence	3.4.2	2.5.2	Data source	All information/ records relating to registration are easily accessible or provided promptly. Records kept in locations specified in registration for specified times.	Key information/ records available, but supporting information is not readily available. Requested information supplied after delay. Records not kept in locations specified in registration or agreed with SEPA.	Key information/ records not available. Requests for information not complied with. Location of records unknown.	
Reports to SEPA required under licence	3.4.3, 3.5.4, 4.2.2, 4.2.2.1, 4.2.2.2, 4.2.2.3, 4.2.3, 4.2.4	2.5.3, 2.6.3, 2.6.4, 2.6.5, 2.6.6, 2.6.7, 3.2.2, 3.2.2.1, 3.2.2.2, 3.2.2.3, 3.2.3, 3.2.4	Data source	Any reports required by the registration are made in the manner specified by the registration/ SEPA and within the specified timescales.	Reports are not made in the manner specified by the registration/ SEPA, do not contain all the required information and/ or are late in submission.	Reports are not made to SEPA.	
Notification of incidents	3.5.1, 3.5.2, 3.5.3	2.6.1, 2.6.2	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.