

ENVIRONMENTAL LIMITS							
ELC Parameter	Typical registration condition #	Data source	No breaches	Minor breach(es) or minor environmental event(s)	Repeated minor breaches	Gross Breaches	Significant breach(es)
<b>Scope ELCs</b>							
Authorised Activity	0.1	Inspection	Compliant with permit/ registration	N/A	N/A	N/A	Change of authorised activity
Authorised Place	0.2	Inspection	Compliant with permit/ registration	N/A	N/A	N/A	Management of radioactive substances outwith authorised place
Authorised Person	0.3	Inspection/ Data Source	Compliant with permit/ registration	N/A	N/A	N/A	Change of authorised person
Prohibition- Receipt of radioactive waste	B.3.1	Inspection/ Data Source	Compliant with permit	N/A	N/A	N/A	Prohibited to receive waste unless described in the permit
Prohibition- Material introduced into environment / organism	B.4.2	Inspection	Compliant with permit	N/A	N/A	N/A	Prohibited to introduce material into environment/organisms unless authorised
Prohibition- dilution to out of scope without authorisation	B.6.2	Inspection	Compliant with permit	N/A	N/A	N/A	Prohibition against dilution of waste to out of scope levels unless authorised in permit
Duty of Care	C.1.1	Inspection	Compliant with permit	N/A	N/A	N/A	Transfer of radioactive substances to someone authorised to receive them
Transfer of waste outwith UK	C.4.1	Inspection	Compliant with permit	N/A	N/A	N/A	Transfer not in accordance with TFS regulations; not for the purpose of treatment; or waste not returned
Transfer of ILW in UK	C.5.1	Inspection	Compliant with permit	N/A	N/A	N/A	Transfer not for treatment; or ILW not returned
Return of radioactive waste	C.6.1	Inspection	Compliant with permit	N/A	N/A	N/A	Return of waste not to authorised place or in accordance with Government Policy
Generic disposal requirements	G.1.1	Inspection	Compliant with permit	N/A	N/A	N/A	Disposal of waste not described in authorisation

Numeric ELCs							
Material holdings limits	B.7.2	Inspection	Compliant with permit	N/A	N/A	Any exceedance of limit	Causes Category 1 (major) or Category 2 (significant) environmental event
Waste Disposal Limits	G.1.3	Inspection/ Data source	Compliant with permit	N/A	N/A	Any exceedance of limit	Causes Category 1 (major) or Category 2 (significant) environmental event
Disposal in normal refuse	G.3.1	Inspection	Compliant with permit	N/A	N/A	Any exceedance of limit	Causes Category 1 (major) or Category 2 (significant) environmental event
Disposals of small quantities of aqueous liquids	G.4.1	Inspection	Compliant with permit	N/A	N/A	Any exceedance of limit	Causes Category 1 (major) or Category 2 (significant) environmental event
Process ELCs							
Return of samples	C.7.2	Inspection	Compliant with permit	N/A	N/A	Returned waste/samples to unauthorised person	Causes Category 1 (major) or Category 2 (significant) environmental event
Waste disposal requirements	G.1.2	Inspection	Compliant with permit	N/A	N/A	Unauthorised disposal of waste	Causes Category 1 (major) or Category 2 (significant) environmental event
Gaseous release - small quantities	G.5.1	Inspection	Compliant with permit	N/A	N/A	Unauthorised release of gaseous waste	Causes Category 1 (major) or Category 2 (significant) environmental event
Gaseous discharges outwith authorised outlets	H.2.1	Data source	Compliant with permit	N/A	N/A	Unauthorised release of gaseous waste	Causes Category 1 (major) or Category 2 (significant) environmental event
Introduction of material into organisms	I.1.1	Inspection	Compliant with permit	N/A	N/A	Unauthorised introduction into organisms	Causes Category 1 (major) or Category 2 (significant) environmental event
Receipt of waste from introduction into organisms	I.1.4	Inspection	Compliant with permit	N/A	N/A	Received waste not originating from introduction into organisms	Causes Category 1 (major) or Category 2 (significant) environmental event
Environmental monitoring programme	J.1.1	Inspection/ Data Source	Compliant with permit	N/A	N/A	Programme not developed, implemented or maintained	Causes Category 1 (major) or Category 2 (significant) environmental event
Numeric statistical ELCs							
none specified							

## ENVIRONMENTAL MANAGEMENT CONDITIONS

EMC Attribute	Authorisation condition #	Data source	Compliant	Minor non-conformance	Major non-conformance	Comments
<b>MANAGEMENT</b>						
Best Practicable Means	A.7.2, B.1.1, B.2.1, B.2.2, B.5.2, B.6.1, B.7.1, C.3.1, C.7.1, G.1.4, G.1.5, I.1.3	Inspection	BPM is fully documented for all requirements. Protection of the environment and the public is optimised. No unnecessary radioactive waste is generated as a result of the management of the radioactive substances. Minimum quantities of radionuclides disposed of.	BPM has not been recorded or justified but is being implemented adequately or BPM described and implemented on most requirements. Protection of the environment or the public is not fully optimised. Not all practicable measures have been taken to prevent the unnecessary generation of radioactive waste. Quantities of radionuclides disposed of not minimised.	No written description of what constitutes BPM and/or failure to implement BPM on significant number of requirements. Protection of the environment and the public not optimised. No/inadequate measures taken to prevent the generation of unnecessary radioactive waste. Significant generation of unnecessary radioactive waste despite any measures taken. No measures taken to minimise the quantities of radionuclides disposed of.	
Managerial structure / commitment	A.1.1, A.2.1	Inspection	Sufficient resource to achieve compliance. Defined management structure with evident organisational commitment to compliance. Clearly identified responsible person.	Resource needed for compliance not always available. Some organisational commitment to compliance. Responsible person not formally recognised.	Resource consistently insufficient to achieve compliance. No organisational commitment to compliance. No clearly identified responsible person.	
Staffing	A.5.1, B.10.1	inspection	Staff carrying out the activity are trained, experienced and competent in their required roles. Contractors are properly controlled and supervised. RWAs appointed and recognised by SEPA. Demonstration that RWAs have been consulted on all significant waste issues. Demonstration that SQEPs supervise the operation/ maintenance of relevant systems and equipment as well as all waste disposals.	Unable to demonstrate that all staff carrying out the activity are suitably trained and experienced. Evidence that despite training, some staff are not fully competent. Contractors not fully controlled or supervised. RWAs appointed, but consultation with them is haphazard. RWAs advice is only partially considered. Unable to demonstrate that SQEPs are supervising the operation/maintenance of relevant systems and equipment as well as disposals.	Significant numbers of staff are not trained, experienced or competent in their role. Contractors are not properly controlled or supervised. RWA not appointed or not recognised by SEPA. No consultation with RWA. SQEPs not supervising the operation/ maintenance of relevant systems and equipment as well as disposals.	
Monitoring & control systems/procedures	A.2.2, A.3.1, A.5.2, B.4.1, B.4.3, B.7.3, B.8.1, C.2.1, C.2.2, C.6.2, C.6.3, F.1.1, G.2.1, H.1.1, I.1.2	Inspection	Management arrangements regularly reviewed and identified issues addressed promptly. Formalised system for ensuring waste is disposed of/transferred regularly. Storage capacity of facility never approached. Effective written procedures available and implemented. No deviations from procedures. Disposal evaluated and assessments of public & environmental impact maintained.	Management arrangements irregularly reviewed and/or identified issues not addressed in timely fashion. Informal or haphazard method to ensure waste is disposed of/transferred regularly. Storage capacity of facility is routinely approached. May require prompt from SEPA to initiate action. Procedures incomplete, but most key area covered. Some deviations from procedures. Disposals not fully assessed or assessments of public/environmental impact not maintained.	Management arrangements not reviewed or identified issues not addressed. No consistent method for ensuring waste is disposed of/transferred. Storage capacity of facility routinely compromised. Requires external prompt to initiate action. No/inadequate written procedures or instructions. Procedures routinely not followed. No evaluation of disposals undertaken. No assessment of public/environmental impact.	

Emergency response procedures	A.9.2(b)+(d), B.5.1, B.9.1(a)+(b), C.2.4	Inspection	Contraventions are investigated promptly and thoroughly. Actions arising from investigations are addressed in a timely fashion. In the event that a substance 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. Waste which is disposed of by transfer and is subsequently found to be outwith the receiving site's authorisation is returned to the Authorised Place forthwith.	Not all contraventions investigated or not investigated thoroughly by appropriate persons. Actions arising from investigation are not acted upon in a timely fashion. In the event that a substance 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 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 transferred and found subsequently to be outwith the receiving site's authorisation is returned to Authorised Place after an avoidable delay.	No investigation undertaken into contravention or actions arising from investigation not acted upon. In the event that a substance 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. In the event that a substance has been unintentionally dispersed, lost or stolen, insufficient steps have been taken to contain the dispersal or retrieve it and/or only after an unreasonable delay. Where waste has been transferred 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.
<b>PLANT &amp; INFRASTRUCTURE</b>						
Condition and operation of plant, equipment and infrastructure	A.6.3(a), B.4.5	Inspection	All containers clearly marked to indicate radionuclide content, activity and reference. All areas where radioactive substances are stored are marked with trefoil/wording to indicate their presence. All facilities and equipment needed for compliance provided and in good repair.	Some containers markings are illegible or do not contain sufficient information. Areas where radioactive substances are stored insufficiently or improperly marked. Not all necessary facilities or equipment provided for compliance or not all kept in good repair.	Containers not identified or illegibly marked. Areas where radioactive substances are stored not identified or illegibly marked. No suitable facilities or equipment provided for compliance. Facilities or equipment in poor condition so an unintended dispersal or generation of unnecessary waste is likely.	
Maintenance of processes, plant and installation to relevant standards	A.6.1, A.6.2, A.6.3(c)+(d), G.3.1(d)	Inspection	Sufficient equipment, facilities and infrastructure provided to manage radioactive substances safely and securely. Formal written arrangements in place and implemented for the acceptance of all equipment and facilities. All areas and equipment can be easily decontaminated in the event of spillage. Equipment, facilities and infrastructure checked to ensure they are serviceable and being used correctly. Any deficiencies noted are corrected as soon as reasonably practicable.	Not all equipment, facilities or infrastructure provided to manage radioactive substances safely or securely. Formal written arrangements for acceptance do not exist for some equipment or facilities. Areas and equipment cannot be easily decontaminated in the event of spillage. Maintenance or checking the effectiveness of equipment, facilities or infrastructure not to relevant standards or frequencies. Deficiencies not recorded or not corrected in a timely fashion.	Few pieces of equipment, facilities or infrastructure are provided to ensure the safe and secure management of the radioactive substances. No formal arrangements exist for acceptance into service. Areas and equipment are not designed or adapted for the containment of spillages or to be easily decontaminated. No regular maintenance or checking the effectiveness undertaken of relevant equipment, facilities or infrastructure. Any deficiencies noted are not acted upon.	
Implementation of monitoring/testing/calibration programmes	A.6.3(b), A.7.1, B.4.4, J.1.2	Inspection	All relevant measuring instruments regularly calibrated to an appropriate standard with certificates available to demonstrate this. Sufficient samples, monitoring, surveys, etc. undertaken to demonstrate compliance. Accountancy checks carried out regularly and recorded.	Incomplete programme of calibration. Calibration certificates not available. No all necessary samples, monitoring, surveys, etc. undertaken to demonstrate compliance or results not consistently recorded. Accountancy checks carried out irregularly or results are not recorded.	No/inadequate calibration of equipment. No sampling, monitoring, surveying, etc. undertaken to demonstrate compliance. Accountancy checks not done.	

REPORTING & RECORDING						
Record keeping	A.4.1, A.4.2, A.4.3, A.9.2(c), B.10.2, C.2.3	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.	
Reports to SEPA required under licence	A.8.1, A.10.1, C.3.2, F.1.2, J.1.3	Data source	All reports required by the authorisation are made to SEPA within the specified timescales and in the specified manner. Reports contain all required information.	Report(s) does not include all required data, is not made in the manner or timescales specified by the authorisation.	Reports not made to SEPA.	This data may include environmental monitoring results if this is specified in the authorisation.
Notification of incidents	A.9.1, A.9.2(a)+(e), B.9.1(c),	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.	There may not be any cause to notify SEPA.