

**NUCLEAR AUTHORISATIONS**

<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 ELC's</b>							
Authorised wastes and disposal routes	2.3.8, 3.1.1, Table 3.1	Inspection & waste returns	Compliant with authorisation	N/A	N/A	N/A	Unauthorised disposal route used or causes Category 1 (major) or Category 2 (significant) environmental event.
Undertaking and Authorised Premises	1.1.1, 1.2.1, Site Plan	Inspection	Compliant with authorisation	N/A	N/A	N/A	Authorised activities occurring outwith Authorised Premises
<b>Numeric ELC's</b>							
Gaseous disposal limits	4.1.2, Table 4.2, Table 4.3	Inspection & waste returns	Compliant with authorisation	N/A	N/A	Any exceedance of limit	Causes Category 1 (major) or Category 2 (significant) environmental event
Aqueous waste disposal limits	5.1.4, Table 5.2	Inspection & waste returns	Compliant with authorisation	N/A	N/A	Any exceedance of limit	Causes Category 1 (major) or Category 2 (significant) environmental event
On-site incineration limits	6.1.4, Table 6.3	Inspection & waste returns	Compliant with authorisation	N/A	N/A	Any exceedance of limit	Causes Category 1 (major) or Category 2 (significant) environmental event
Off-site disposal limits (e.g. activity, volume)	Table 7.1	Inspection & waste returns	Compliant with authorisation	N/A	N/A	Any exceedance of limit	Causes Category 1 (major) or Category 2 (significant) environmental event
<b>Process ELC's</b>							
Authorised gaseous disposal outlets (e.g. specified stacks)	4.1.1, Table 4.1	Inspection	Compliant with authorisation	N/A	N/A	Unauthorised waste disposal	Causes Category 1 (major) or Category 2 (significant) environmental event
Authorised aqueous waste discharge system	5.1.1, Table 5.1	Inspection	Compliant with authorisation	N/A	N/A	Unauthorised waste disposal	Causes Category 1 (major) or Category 2 (significant) environmental event
Tidal window for marine discharges	5.1.2	Inspection	Compliant with authorisation	any breach of licence condition	4 or more minor breaches	N/A	Causes Category 1 (major) or Category 2 (significant) environmental event
Only specified waste disposed of in specified on-site incinerator	6.1.1, 6.1.2, Table 6.1, Table 6.2	Inspection & waste returns	Compliant with authorisation	N/A	N/A	Unauthorised waste disposal	Causes Category 1 (major) or Category 2 (significant) environmental event
Only specified wastes disposed of to specific Named Person within UK	7.1.1, Table 7.1	Inspection & waste returns	Compliant with authorisation	N/A	N/A	Unauthorised waste disposal	Causes Category 1 (major) or Category 2 (significant) environmental event
Only specified wastes disposed of to specific Named Person outwith UK	8.1.1, Table 8.1	Inspection & waste returns	Compliant with authorisation	N/A	N/A	Unauthorised waste disposal	Causes Category 1 (major) or Category 2 (significant) environmental event
<b>Numeric statistical ELC's</b>							
none specified							

<b>ENVIRONMENTAL MANAGEMENT CONDITIONS</b>						
<b>EMC Attribute</b>	<b>Authorisation condition #</b>	<b>Data source</b>	<b>Compliant</b>	<b>Minor non-conformance</b>	<b>Major non-conformance</b>	<b>Comments</b>
<b>MANAGEMENT</b>						
Permit implementation plan	10.1	inspection, reports	All improvements/actions completed satisfactorily and to timescale. All Improvement Plans are properly resourced and monitored.	Most specified improvements completed. All improvements completed, but not to timescales. Improvement Plan is limited in scope or is poorly resourced.	No specified improvements completed. No/inadequate Improvement Plan produced.	May not be specified in authorisation. Actions/timescales can be specified in Enforcement Notices or in formal undertakings with the site operator.
Managerial structure/commitment	2.2.1	inspection	Defined management structure with evident organisational commitment to compliance. Environmental objectives are set, monitored and reviewed. Effective EMS in place that includes an environmental policy and	Defined management structure but limited organisational commitment to compliance. No clear allocation of responsibilities for environmental performance including compliance with the authorisation. EMS in place	No organisational commitment to certificate compliance. No EMS. No commitment to environmental compliance. System and procedures in place but are unfit for purpose or are not used.	

Staffing	2.2.1.4, 2.2.1.5, 2.2.3, 2.2.3.1, 2.2.3.2, 2.2.3.3, 2.2.3.4	inspection	QE's appointed and recognised by SEPA. Demonstration that QE's have been consulted on all significant disposal issues. Demonstration that SQEP's supervise the operation/maintenance of relevant systems and equipment as well as all waste disposals. Staff are competent in their required roles.	QE's appointed, but consultation with them is haphazard. QE's advice is only partially considered. Unable to demonstrate that SQEP's are supervising the operation/maintenance of relevant systems and equipment as well as disposals.	QE not appointed or not recognised by SEPA. No consultation with QE. SQEP's not supervising the operation/maintenance of relevant systems and equipment as well as disposals. Staff are not competent in their role. Contractors are not properly controlled or supervised.	
Continuous improvement	2.1.1, 2.1.2, 2.1.2.1, 2.1.2.2, 2.3.6, 4.1.4, 5.1.3, 6.1.3	inspection	BPM for all aspects of operation/decommissioning is fully documented and available for inspection. BPM is regularly reviewed and takes into account social and economic costs in the optimisation process used to decide what is practicable.	BPM has not been recorded or justified for all aspects of operation/decommissioning but is being implemented adequately or BPM described and implemented but is inadequate in its scope for all aspects. BPM is not regularly reviewed.	No written description of what constitutes BPM for many aspects of the operation/decommissioning and/or failure to fully implement BPM in all aspects. BPM is not regularly reviewed. Optimisation process does not take into account social	
Internal/External audits undertaken	2.2.1.6, 2.3.5	inspection	The management system and its efficacy is regularly reviewed internally and the results published. Any/all external audits into the management system are readily available for inspection. The environmental monitoring programme is also regularly reviewed and the results	The management system, its efficacy and/or the environmental monitoring programme are infrequently reviewed either internally or externally. The results of any such review are not readily available. Some actions are not followed through to completion.	The management system, its efficacy and the environmental monitoring programme are not reviewed or the results of any such reviews are not available for inspection.	
Monitoring control systems/procedures	2.2.1.1, 2.2.1.2, 2.3.2, 7.1.2, 7.1.2.1, 7.1.2.2, 7.1.2.3, 8.1.2, 8.1.2.1, 8.1.2.2, 8.1.2.3, 8.2.1	inspection	Effective written procedures available and implemented. No deviations from procedures. Comprehensive "compliance matrix" and environmental operating rules in place and regularly reviewed/updated. Documented and justified environmental monitoring programme in place to assess BPM requirements. Programme implemented and subject to periodic review/update. Results used to inform monitoring programme. Radioactive content of waste fully characterised in written form and demonstration	Procedures incomplete, but most key area covered. Some deviations from procedures. Incomplete "compliance matrix" and/or environmental operating instructions. Documents not regularly reviewed. Environmental monitoring programme in place but not fully documented. Results do not demonstrated BPM. Programme not regularly reviewed. Results not used to inform programme. Radioactive content of waste not fully characterised. Unable to demonstrate that data was supplied prior to disposal of waste.	No/inadequate written procedures or instructions. Procedures routinely not followed. No/inadequate "compliance matrix" and/or environmental operating instructions. No/inadequate environmental monitoring programme. Radioactive content of waste not characterised. Data not supplied to prior to disposal of waste.	
Emergency response procedure/accident response/response to incident (short term)	7.1.6, 8.1.6	inspection	Radioactive waste that cannot be delivered for any reason is returned to the Authorised Premises forthwith. Timely response to incidents to prevent and mitigate the impacts of the release. Follow-up investigations and reports prepared. Any impacts remediated promptly.	Waste that cannot be delivered for any reason returned to Authorised Premises after avoidable delay. Limited response to incident to stop release but with little or no follow-up to remediate any impacts.	No attempt made to retrieve waste that cannot be delivered for any reason. No/ineffectual response to incidents.	The Authorisation Holder may not experience any events of this nature.
<b>PLANT &amp; INFRASTRUCTURE</b>						
Condition and operation of plant, equipment and infrastructure	2.3.10, 2.3.10.1, 2.3.10.2, 2.3.11, 2.3.11.1, 2.3.11.2	inspection	Relevant systems and equipment are provided at all times, fit for purpose and kept in good repair with few, if any, breakdowns.	Minor deficiencies in provision of systems and/or equipment. Some systems or equipment are not fit for purpose or are subject to frequent breakdown.	Inadequate provision of systems and equipment. Most systems and equipment are not fit for purpose or subject to frequent breakdowns.	Refers to all systems and equipment used to minimise the radioactivity of gaseous and aqueous waste disposed of to the environment and to ensure that waste is disposed of at times, in a form and in a manner so as to minimise the radiological effects on the environment and members of the public
Monitoring equipment	2.3.10, 2.3.10.1, 2.3.10.2	inspection	Relevant systems and equipment are suitable for the task, available for use and kept in good repair with few, if any, breakdowns.	A few of the systems and/or equipment used for sampling and monitoring to determine compliance with the authorisation, assessing exposure of members of the public or radioactive contamination of the environment are not suitable for the task, are not always available on the site or are not reliable and subject to frequent breakdowns.	Systems and equipment used for sampling and monitoring to determine compliance with the authorisation, assessing exposure of members of the public or radioactive contamination of the environment are not suitable for the task, not available on site or are not working for extended periods of time.	Refers to systems and equipment used for sampling and monitoring to determine compliance with the authorisation, assessing exposure of members of the public or radioactive contamination of the environment

Maintenance of processes, plant and installation to relevant standards	2.1.4, 2.1.4.1, 2.1.4.2, 2.2.1.3	Inspection	Formally developed maintenance programme based on relevant standards with appropriate frequencies which takes into account environmental effects for all environmentally critical plant. Maintenance programme contains systems to analyse faults and prevent recurrences. Appropriate precautions in place to prevent unauthorised releases due to maintenance activities.	Incomplete maintenance programme for all environmentally critical plant. Not all maintenance undertaken to relevant standards or appropriate frequencies. Environmental effects of maintenance activities only partially considered.	No/unsuitable planned maintenance programme for environmentally critical plant. High frequency of breakdowns. Relevant standards and frequencies not established. Maintenance takes no account of environmental effects of breakdowns. Equipment performance deteriorates significantly between maintenance activities.	
Implementation of monitoring/testing/calibration programmes	2.3.1, 2.3.7, 2.3.11, 2.3.11.1, 2.3.11.2, 2.3.12, 2.3.12.1, 2.3.12.2, 4.4.1, 4.4.1.1, 4.4.1.2, 4.4.1.3, 4.4.1.4, 4.4.1.5, 4.5.1, 5.3.1, 5.4.1	Inspection	Samples et al sufficient to demonstrate compliance and are fully recorded. BPM is used and documented. Samples kept as specified. All relevant equipment regularly calibrated to an appropriate standard. Certificates available to demonstrate this. Effectiveness checked regularly and results recorded. Deficiencies noted are corrected as soon as reasonably practicable. Formal, written arrangements in place and implemented for acceptance of all systems and equipment.	Incomplete samples et al to fully demonstrate compliance. Samples et al undertaken but not adequately recorded. BPM may be used but not documented. Most samples kept as specified. Incomplete programme of calibration. Calibration certificates not available. Incomplete checking of all systems and equipment. Failure to record results of checking. Arrangements/criteria for acceptance are not formally recorded, but are being implemented. Formal, written arrangements do not exist for some systems/equipment.	No/inadequate samples et al undertaken. Samples et al do not demonstrate compliance. BPM not used. Few/no samples kept as specified. No/inadequate calibration of equipment. No checking of effectiveness undertaken. No/inadequate arrangements for acceptance into service.	
<b>REPORTING + RECORDING</b>						
Record keeping	2.4.1, 2.4.1.1, 2.4.1.2, 2.4.2, 2.4.3, 2.4.3.1, 2.4.3.2, 2.4.3.2.1, 2.4.3.2.2, 2.4.3.2.3, 2.4.3.2.4, 2.4.3.2.5, 2.4.3.2.6, 2.4.4, 2.4.5, 2.4.6, 7.1.3, 7.1.4, 7.1.5, 8.1.3, 8.1.4, 8.1.5	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. Some records are not kept or do not comply with the requirements of the authorisation.	Limited or non-existent records. Failure to record a significant proportion of the data required by authorisation.	
Information and records available as required by licence	2.5.1	Data source	All information/records held in central location and easily accessible. Relevant staff are aware of recorded information.	Key information/records available, but supporting information is not readily available.	Information not available.	
Reports to SEPA required under licence	2.3.3, 2.5.2, 2.5.3, 2.5.5, 9.1.1	Data source	Information provided as specified in authorisation on time, in the format specified and are of appropriate quality and content.	Information provided as specified but not on time, in the format specified or of appropriate quality and content.	Information not provided as specified. Information is of poor quality or content.	
Notification of incidents	2.2.2, 2.3.4, 2.5.4, 4.2.1, 4.2.1.1, 4.2.1.2, 4.3.1, 4.3.1.1, 4.3.1.2, 4.3.1.3, 5.2.1, 5.2.1.1, 5.2.1.2, 5.2.1.3	Data source	All notifications made to SEPA within timescales and containing specified information. Authorisation Holder is proactive in discussing incidents and events.	Notification of incidents is not consistent. Incident notifications do not comply with the information requirements specified in the authorisation.	Notifications not made to SEPA.	