

# Forty Third Meeting of the Scottish Non-Nuclear Industries Liaison Group (SNNILG) – Minutes

**Date:** Wednesday 12th March 2025

**Time:** 10:00-12:00

**Location:** TEAMS

**Attendees:** SEPA – chair, secretariate, operations, science & policy team reps, Association of University Radiation Protection Officers (AURPO), NHS Greater Glasgow and Clyde (NHS GGC), Health and Safety Executive (HSE), Scottish Schools Education Research Centre (SSERC), UK Health Security Agency (UKHSA), Scottish Radiation Protection Advisers (SRPA), Institute of Physics and Engineering in Medicine (IPEM), NHS Tayside, Offshore Energies UK (OEUK) x 2, Society for Radiological Protection (SRP), Environment Agency (EA), Northern Ireland Environment Agency (NIEA), Office for Nuclear Regulation (ONR) Transport, ONR Safeguards x 2

**Apologies:** Scottish Government, Ministry of Defence (MOD)

## Welcome, introduction and apologies

As noted above.

## Actions arising

**Action update: SEPA to arrange a demonstration to SNNILG of their Dose Assessment Tool – CLOSED**, on the agenda for a demonstration

**New Action:** SEPA to advise SNNILG of high-level changes to the Public Participation Statement and Fit and Proper Person Test which are out for consultation.

**New Action:** SEPA to provide an update on the status of authorisation of radioactive substances that are part of abandoned offshore platforms.

## SEPA Update

### Operations Team update

#### RS Charging scheme

SEPA is reviewing the RS Charging scheme however for FY25/26 there will be an inflationary rise of 2.7% with the new scheme published in April.

#### Operation Fieldfare

Fieldfare has experienced delays, and the project team will be in touch when they have further information. Any specific questions should be sent by e-mail to SEPA.

POST MEETING NOTE: The NDA, with their partner Nuclear Transport Solutions (NTS), is leading on the procurement and delivery of the first phase of this programme which went out to tender 25 March 2025 [The provisions for services to collect, transport, store and process existing High Activity Sealed Radioactive Sources \(SRS\) using a pre-determined disposal route. - Find a Tender](#)

### Policy Team update

#### Environmental Authorisations Scotland Regulations Amendment Regulations

EASR has been laid in parliament and is expected to come into force 1<sup>st</sup> November 2025 for the majority of regulated activities. The minor RS amendments will be 1<sup>st</sup> November. SEPA is continuing to progress integration of the other regimes into its regulatory systems.

## Consultations

SEPA is consulting on [Proposed Changes to the Environmental Regulation \(Scotland\) Guidance on Public Participation and Fit and Proper Person Test - Scottish Environment Protection Agency - Citizen Space](#) – closes **30<sup>th</sup> March**.

Earlier in February we published three radioactive substances consultations on [SEPA's Consultation Hub](#). The direct links are below:

- [Consultation on our Objectives and Principles for Regulating Radioactive Substances Activities](#)
- [Consultation on the Environmental Standards for Inputs of Radioactive Substances into Groundwater](#)
- [Consultation on Near-surface Disposal Facilities on Land for Solid Radioactive Wastes: Guidance on Requirements for Authorisation](#)

All three consultations close midnight on **5<sup>th</sup> May 2025**.

## NORM Shipments update

The Environment Agency have published a Regulatory Position Statement (RPS) on imports of UK NORM waste direct to England for disposal. The RPS was designed to allow repatriation of UK NORM waste for disposal, consistent with Government policy and the UK Plan for the Shipments of Waste, following EU Exit legislative difficulties. The UK origin NORM waste cannot transit through Scotland and must go direct to England. Provided the RPS is in place and further to SEPA letter to industry in September 2023, the repatriation of UK NORM waste for disposal issue is no longer a barrier to consent to the export of installations for decommissioning overseas.

# SEPA Dose Assessment Tool update, demonstration and associated research

SEPA science team provided an update on the RDATE (radiological dose assessment tool).

## Regulator updates

### ONR Transport Update

- We have planned our inspections for the next financial year, this covers non-nuclear and nuclear dutyholders. For Non-nuclear this covers an array of different industries (Hospitals, NDM gauges, carriers).
- We have a new Chief Nuclear Inspector this is Mike Finnerty starting later this year as well as a new Chair of ONR who is Dr Nicola Crauford starting in March.
- We have undertaken a number of formal enforcement action and served two improvement notices in December this was to Transrad SA for not a suitable and sufficient Radiation Risk Assessment and Reviss Services (UK) Ltd, when using the carrier services of another organisation, had not complied with legislation that consignments meet the requirements of the Agreement concerning the International Carriage of Dangerous Goods by Road (ADR).
- We have been made aware of several incidents of packages being delayed at airport in-transit stores due to issues with collection. Dutyholders should be aware when arranging transport through in-transit stores, collection should be made within an appropriate timeframe. There have also been several incidents where excepted packages have been transported without correct marking or documentation. Dutyholders should be aware that when transporting excepted packages, ADR compliance is still required.
- We have been made aware of an incident involving a Type A package where the lid came off the package. This was down to the manufacturer changing the design of the hinge, without informing the dutyholder of the modification.

This Type A package design with the modified hinge has been removed from service.

- Just a reminder, the new ADR25 and RID25 Regulations are now available and free to download on the internet. There will be transitional arrangements for each of the new regulations where the dutyholder can still transport Class 7 under the old regulations for a period of time (in the case of ADR/RID this is six months). Just to note ICAO TI has no transitional arrangement.
- We have been made aware of several carriers transporting High Activity Sealed Sources (HASS) without the appropriate consent certificate required under IRR17 Regulation 7. If you are aware of any carrier transporting HASS without a consent certificate, contact us.
- The revised IAEA SSR-6 was approved to go forward to final technical editing and forthcoming publication.
- The latest TCA newsletter is now available, this should have been distributed to you if you are on the mailing list. If you don't have a copy and would like one, please contact [class7@onr.gov.uk](mailto:class7@onr.gov.uk).

## HSE Update

### HSE radiation team operational activities

- RADAN – about to issue updated industrial radiography safety assessment template.
- About to prosecute an industrial radiography company for an overexposure.
- A number of investigations ongoing.

### Staffing

- Stephanie Slater left the radiation team.
- Susan Clarke and Suzanne Broadhead joined the radiation team.

HSE ran an industrial radiography working group meeting in Bootle on 20 March 25.

We are running an RPA Workshop event in Bootle on 22 May 25.

## EA Update

### Security Requirements Document

- Environment Agency continues to work with other UK Environmental regulators including SEPA.
- EA delivered joint presentation on behalf of all UK Environmental regulators at SRP Source Security course in March, including the basics of security regime and implementation of new requirements.
- Environment Agency regulators and CTSA's are holding office-based meetings with operators for assessment of **offshore facilities**.
- Environment Agency program to make joint visits with local CTSA's to sites in the first year of implementation is progressing well, with 73% visits completed, 27% remaining.

### Distribution of Security Requirements Document

In response to a question about distribution of the security book the Environment Agency response by explaining that NaCTSO and the 4 UK Environmental Regulators have a planned and staged roll out of the updated Security Requirements for the first year. This is to manage demand on both CTSA's and environmental regulators' inspectors. Books are being issued to sites on their annual visit cycle and therefore to maintain control we will not consider issuing the book any wider until the full roll out is complete.

The case for RPA/RWA access to the book will be reviewed at the end of the first year of implementation (July 2025). Until then, should RPAs/RWAs require access, they should be able to view a hardcopy at the site/s they are advising.

### Operational News

- Environment Agency NORM Regulatory position statement is available at:
  - [Imports of UK origin naturally occurring radioactive material waste to England: RPS 323 - GOV.UK](#)
- Revised regulatory appeal process:

- The Environment Agency introduced a revised regulatory appeal process on 3 December 2024 [Appeal a regulatory decision from the Environment Agency - GOV.UK](#)
- As a result, the radioactive substance regulatory teams have amended the Customer Charter wording in their RASCARs (Radioactive Substances Compliance Assessment Reports).
- Lu-177 monitoring project:
  - We have completed the sampling phase of the project, and our contractor is currently working on producing a final report. We hope to publish the report on Gov.uk later this year.
  - Longer lived contaminants reported in some medical radionuclides for example Ac-225 containing Ac-227.
  - The Environment Agency currently looking at the implications which may impact on decay storage.

### Medical Radioisotope Innovation Programme: Regulatory Study

- The environmental regulators, along with other regulators including the Health and Safety Executive (HSE) and the Office for Nuclear Regulation (ONR), took part in the Regulatory Study strand of the Department for Energy Security and Net Zero's (DESNZ) Medical Isotope Innovation Programme. The programme is aimed at supporting the development of technologies that could enable future access to medical radioisotopes in the UK. The Regulatory Study stream was completed in September, when the regulators submitted a report and presentation to DESNZ. The report will be made available in due course.
- Information about other streams of the programme is available on the gov.uk website: [Medical Radionuclide Innovation Programme \(closed to applications\) - GOV.UK](#)

### Plans for integrated nuclear delivery

- From April 2025 the Environment Agency will bring together the operational nuclear regulatory teams and the radioactive substances strategy teams together under integrated nuclear function. The new integrated function will sit in the Chief Regulator's Group under Jo Nettleton as the Chief Regulator.

- There will be no change to delivery of RSR non-nuclear regulation with 6 operational area RSR/installations teams.

## NIEA Update

Work to develop NIEA's proposed new Environmental Permitting Regime has been paused and no timescale has been set for resumption. However, some aspects of this work will be taken forward, for example the digital transformation project.

Staff changes – Gillian Wasson is currently acting Chief Inspector for Industrial Pollution and Radiochemicals. The RAS team is currently running under its staff complement and so a reduced inspection programme has been agreed for 2024 – 2025. The programme is progressing as normal and is due to be completed by the end March: no new issues have been identified so far.

A new inspector is joining the RAS team in April, initially on a 12-month secondment. It is planned to run a full inspection programme for 2025 – 2026.

The long-term issues with returning disused Brachytherapy sources seems to have been resolved. Sources are now being delivered and returned via Dublin.

NIEA has continued to work with the other UK environmental regulators and NaCTSO regarding implementation of the new requirements for radioactive source security, which were issued in July 2024. One difference from SEPA is that there are no standard conditions in NIEA's regulations, so the implementation plan includes issuing a variation to each permit to refer to the 2024 regulations.

NIEA has continued to be involved in discussions regarding Project Fieldfare.

## ONR safeguards

### Qualifying Nuclear Facilities with Limited Operation (QNFLO)

The QNFLO – existing and new

- ONR Safeguards QNFLO Team currently have oversight of 125 QNFLO and 3 QNF\* who full report.
- Since April 2024 we have deregistered 5 QNFLO and registered 6 new QNFLO.

## Enforcement

- There is currently no ongoing enforcement.
- There has been no enforcement during 24/25.

## Incidents

- There is currently no live incidents via the INF1 process.
- There have been 9 incidents reported during 24/25, all of which have been closed.

## Changes to QNFLO requirements

- ONR Safeguards QNFLO team have sent out an Addendum to the Reg31 granting letter, adding an additional requirement.
- This additional requirement will be to confirm the receipt of all imports of QNM into the UK and/or consignment of all exports of QNM from the UK to ONR Safeguards office.
- This additional requirement is necessary to enable the UK to meet its international obligations.
- Adherence to the Addendum will be from 1 April 2025.

## QNFLO Inspection and Assessment

### Regulatory Strategy for QNFLO

#### Inspection & Assessment:

- 14 QNFLO safeguards compliance inspection/assessments are scheduled for 2024/2025 to sample and inspect the implementation of arrangements for Nuclear Material Accountancy, Control and Safeguards (NMACS) as described within the ACP.
- Main findings have been:
  - Poor signposting to management arrangements.
  - Named contacts in BTC's, advice provided – generic emails are more beneficial for resilience.

- To date:
  - 2024/2025 – 10 Inspections and 1 targeted engagement have taken place and all rated Green.
  - 1 Inspection remains to be undertaken in 2024/2025.
  - 2025/2026 - 11 inspections and 13 targeted engagements are scheduled.

## QNFLO Strategy

### Current strategic thinking

The QNFLO Strategy targets operators with the largest QNM inventories and concentrates on intelligence led reactive inspections or assessments from accounts, INF1s and information from ONR Transport, the Environment Agency and the Health and Safety Executive.

There are 3 types of QNFLO to be prioritised in this order:

- Those with significant quantities on the facilities list - Visit once in 3 years & assess ACP.
- Those with significant quantities and full reporting - Visit once in 3 years.
- All others concentrating on those holding HEU, then LEU then DU.- Visit or assess accounts once in 10 years or intelligence led.

ONR will focus on operators with the largest amounts of QNF and those where the material is mobile and could easily be diverted.

ONR will group smaller QNFLOs geographically and undertake inspections on that basis.

### The QNFLO ten-year strategy

The QNFLO strategy includes:

- Continued discussions with external regulators to identify ONR unknown operators and sharing inspection information relating to the QNFLO.
- Recent outreach to ~75 operators has resulted in half 14 new Regulation 31 applications, out of the ~50 responders.

- Continued stakeholder engagement and support to enable sustained regulation.

## QNFLO Reminders

### REMINDER

The QNFLO annual reports consisting of a physical inventory list (PIL) and material balance report (MBR) are due on or before the 15 March 2025\*.

\*Unless you have agreed to carry out your physical inventory take (PIT) at another date throughout the year.

### INF1 – INCIDENT NOTIFICATIONS

INF1's are ONRs incident notification forms and the process via which you report incidents can be found at [Notifying and Reporting Incidents and Events to ONR](#).

### REVIEW OF REGULATION NSR19

- NSR19 has been reviewed by the UK Government and updated NSR will be provided in the near future. We will conduct outreach regarding the changes.
- Guidance will be provided through Teams sessions or updates to the ONR Safeguards Inspector Guidance.

## Guidance

Listed below are updated links to relevant guidance documents for the QNFLO.

- [ONR Nuclear Material Accountancy, Control, and Safeguards Assessment Principles \(ONMACS\)](#)
- [Nuclear Material Accountancy \(onr.org.uk\)](https://onr.org.uk)
- [Notify ONR | Office for Nuclear Regulation](#)

## AOCB

SEPA was asked whether we will be doing any joint CTSA inspections. We have decided not to do joint CTSA inspections however we continue to liaise closely with them.

The question was asked how the new security requirements document (SRD) will apply offshore. SRD does apply offshore [SEPA's Regulatory Position Statement](#) and the guidance necessary to complete a Site Security Plan is contained within the SRD, supported by the RPS.

There is a CTSA/SEPA information sharing event on 24<sup>th</sup> April hosted at OEUK offices. CTSA will lead and will provide copies of the SRD booklet to operators at the event. RPAs have not been invited to this event. It was reiterated that SRD booklet belongs to NaTSCo and will not be shared with RPAs at this time.

SEPA was asked whether any sources had been removed prior to the delays in Fieldfare. Response is that all who are affected in the first phase have had correspondence from the project team with an update.

SNNILG would like to express thanks to Gregor Steele SSERC for his contribution over the years and wish him well in his retirement.

## Date of next meeting

Options will be sent round asking for preference of in person or TEAMS. Aberdeen, Stirling or Glasgow are potential options for in person.

If you would like this document in an accessible format, such as large print, audio recording or braille, please contact SEPA by emailing [equalities@sepa.org.uk](mailto:equalities@sepa.org.uk).