

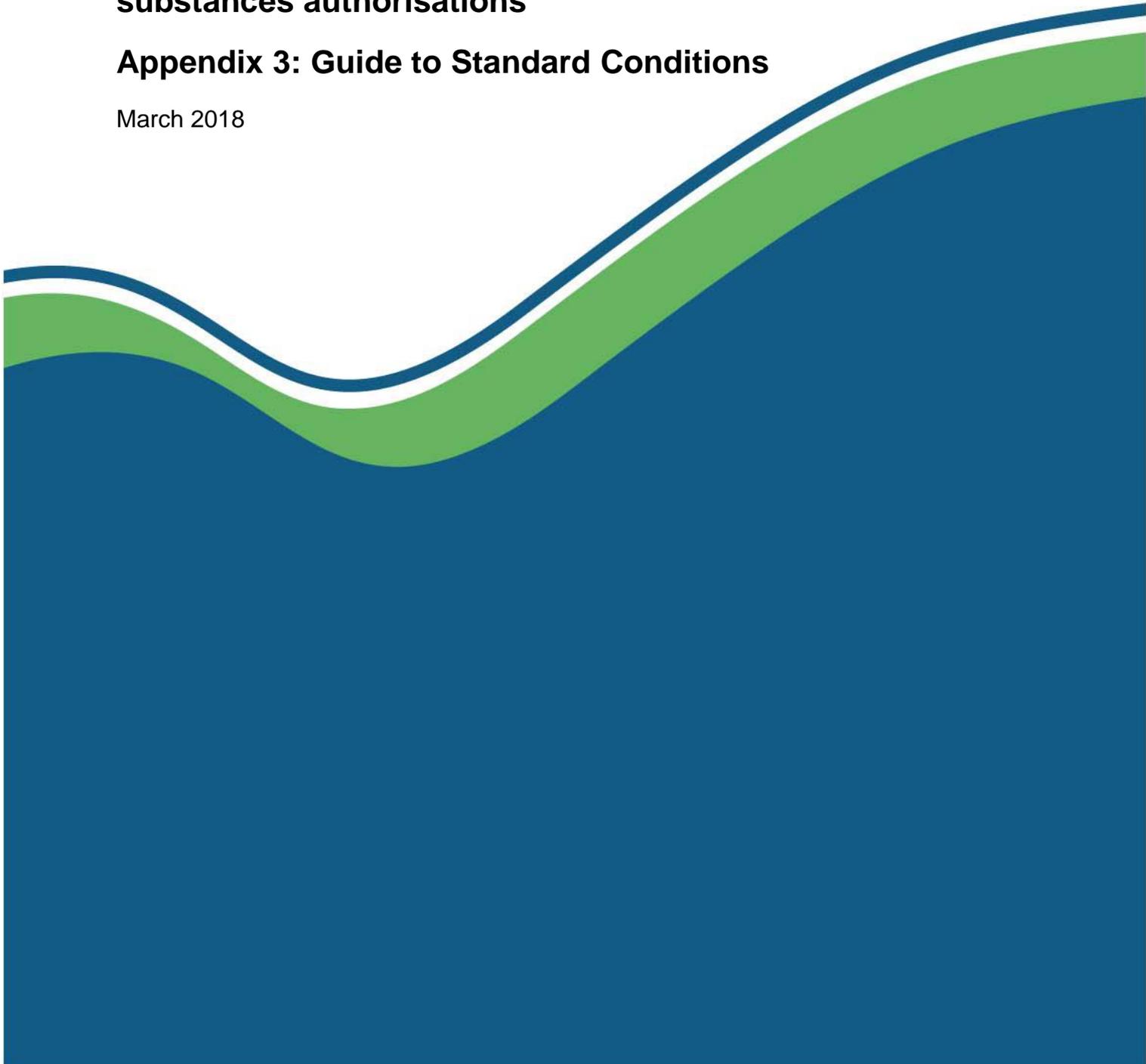
Better Environmental Regulation Programme

Environmental Authorisations (Scotland) Regulations 2018

## **Consultation on draft Standard Conditions for radioactive substances authorisations**

### **Appendix 3: Guide to Standard Conditions**

March 2018



## A. ALL REGULATED ACTIVITIES

### A.1 Resources

<p>A.1.1 <i>You must have adequate financial and human resources to ensure compliance with your authorisation.</i></p>	<p>Condition</p>
<p>This condition supports IAEA GSR part 2 requirement 9 and Article 7(5) of the SFRWD. Providing and maintaining sufficient resource to carry out your management arrangements is fundamental to ensuring control of the radioactive substances.</p>	<p>Reason</p>
<p>SEPA does not specify minimum resource levels, such as numbers of staff or size of budget- this is left to you to decide what is necessary. We do expect this to be written down in, in at least an indicative manner, and available for inspection, along with any justifications for deviating from what you believe to be the optimum level.</p>	<p>Guidance</p>

### A.2 Management arrangements

<p>A.2.1 <i>You must have and maintain an integrated management system to ensure compliance with your authorisation.</i></p>	<p>Condition</p>
<p>This condition supports IAEA GSR part 3 requirements 5 and 9 and Articles 5(1)(d), 5(1)(h), 7(4) and 7(5) of the SFRWD.</p> <p>You need a formal, robust management system to ensure control of the radioactive substances at all times in order to avoid an unplanned exposure to a member of the public, harm to the environment or the generation of unnecessary radioactive waste.</p>	<p>Reason</p>
<p>Good management is fundamental to ensuring the safety of the radioactive substances. SEPA expects a defined management structure with evident organisational commitment to compliance with the Authorisation. Staff at various levels should be able to explain their roles and responsibilities in relation to radioactive substance management.</p> <p>By “integrated” SEPA means the arrangements for the management of radioactive substances should be part of the overall management arrangements you have, such as quality or health and safety - not a stand-alone system.</p> <p>The types of things that should form the management arrangements are, for the most part, the topics of the rest of the Standard Conditions in Sections A and B.</p> <p>For more information on management systems, see the IAEA Safety Standards document “Application of the Management System for Facilities and Activities (GS-G-3.1)”.</p>	<p>Guidance</p>

<p>A.2.2 <i>You must regularly carry out a review of your management system and its effectiveness in terms of achieving compliance with your authorisation.</i></p>	
<p>This condition supports IAEA GSR part 2 requirement 13 and Articles 7(2) and 7(4) of the SFRWD.</p> <p>Internal review of the management system provides demonstration that it remains fit for purpose for ensuring the safety of the radioactive substances.</p>	Reason
<p>SEPA expects you to review or audit the management system in your organisation in relation to radioactive substances on a regular basis. The frequency of the review or audit has not been defined; however, it should reflect the complexity of the radioactive substances activities undertaken. When deviations are identified, appropriate corrective actions should be proposed and taken.</p> <p>SEPA expects that the review or audit will be recorded and the outcome will be written down and available for inspection.</p> <p>It is possible to make use of external audits, for example relating to ISO 14000 accreditation, to comply with this rule. However, the audit must specifically cover your management system in relation to radioactive substances and compliance with this Authorisation.</p>	Guidance

### A.3 Written procedures

<p>A.3.1 <i>You must have, implement and maintain written procedures to ensure compliance with your authorisation.</i></p>	Condition
<p>This condition supports IAEA GSR part 2 requirement 8 and Article 5(1)(d) of the SFRWD.</p> <p>Written procedures are the fundamental underpinning of your management arrangements for activities involving radioactive substances and compliance with the conditions and limitations of the Authorisation. These procedures must be regularly and formally reviewed to ensure they remain valid and reflect the current arrangements.</p>	Reason

<p>The purpose of requiring the written procedures is to ensure you detail how you will comply with your Authorisation. It is essential that you carefully scrutinises the Standard Conditions and any bespoke rules in your Permit and ensures that there are appropriate procedures in place to cover all of them. SEPA expects that the detail and complexity of the procedures will be proportionate to the risk posed by the radioactive substances and the complexity of their activities involving radioactive substances.</p> <p>Procedures can be in electronic or paper form. However, SEPA does expect that you will have considered the maintenance, security and redundancy issues of both formats and made suitable arrangements.</p> <p>It is not necessary to duplicate existing procedures or documents solely for the purposes of satisfying this requirement. It is perfectly acceptable to refer out to existing procedures. Although not required, you may prefer to create a compliance matrix document that specifically addresses how each requirement will be complied with or signposts where the appropriate procedure can be found.</p> <p>It is recommended that the relevant procedures are incorporated into your controlled document management system (if available) in order to ensure that they have formal standing within your organisation, a recognised person responsible for their maintenance and they are subject to periodic review in accordance with your quality management system.</p>	Guidance
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#### A.4 Record keeping

<p><i>A.4.1 You must make and retain, as soon as reasonably practicable, true, accurate and legible records that demonstrate compliance with the requirements of your authorisation.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirements 13 and 17, Article 5(1)(d) of the SFRWD and Articles 85(2) and 86(2) of the BSSD.</p> <p>Records are the principle means of demonstrating compliance with the requirements attached to the Authorisation. For that reason, it is imperative that the records are true, accurate and legible.</p>	Reason

<p>“Records” refers to a wide range of documents, from the specified data required to be kept by other Standard Rules to things such as BPM cases, contamination or environmental monitoring and staff training records. Any document that you use to demonstrate compliance with the Authorisation will fall into this category. This may include previous authorisations issued to you or authorisations issued to another person that has been transferred to you.</p> <p>SEPA does not require the records to be kept in a particular format (e.g. electronic or paper). However, SEPA does expect that you will have considered the maintenance, security and redundancy issues of both formats and made suitable arrangements to ensure the records are available as required.</p> <p>SEPA does not specify the location where your records must be kept (e.g. at the Authorised Place). However, wherever they are kept, bear in mind that SEPA expects all records to be reasonably available for inspection.</p> <p>It is recognised that you may use the records for other purposes (e.g. billing) and that some records may also be kept by different parts of your organisation (e.g. finance, facilities, and human resources) or by contract partners. It is your responsibility to ensure the relevant records are accessible, legible and are set out in a manner to demonstrate compliance with the Authorisation.</p> <p>SEPA does not set any restrictions on the length of time you must keep your records. However, you must consider what each record does in terms of demonstrating compliance. You may prefer to establish a record retention schedule for all of your records, setting out the time you intend to keep them. Please note that SEPA will not approve the schedule, but we may ask to see it as part of an inspection.</p>	Guidance
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<p><i>A.4.2 Your records must include the relevant records specified in Schedule 1 of these Standard Conditions.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirements 13 and 17, the IAEA Code of Conduct of the Safety and Security of Radioactive Sources and EA(S)R schedule 8 para 19 (f) (G) (h).</p> <p>SEPA has prescribed a minimum set of records for each Regulated Activity or sub-activity in order to ensure that there is a minimum amount of information available. Schedule 1, row 2 fulfil BSSD articles 85 &amp; 86.</p>	Reason
<p>The prescribed set of records is the minimum you must keep. SEPA anticipates that you may need to keep many other records to fully demonstrate compliance with your Authorisation.</p>	Guidance

## A.5 Provision of training and information to staff

<p>A.5.1 <i>You must ensure that anyone carrying out duties that may affect compliance with your authorisation are suitably trained and experienced.</i></p>	<p style="text-align: center;">Condition</p>
<p>This condition supports IAEA GSR part 3 requirement 26, Article 8 of the SFRWD and Article 14(1) of the BSSD.</p> <p>In order to ensure compliance with your arrangements, it is necessary that all staff that have access to the radioactive substances or responsibility for compliance with the authorisation are appropriately trained.</p>	<p style="text-align: center;">Reason</p>
<p>This requirement applies to both staff that interact with the radioactive substances as part of their normal duties as well as their supervisors and managers who will have responsibility for compliance with the Authorisation. It is expected that the level of training will be proportional to the level of interaction and responsibility of the individual staff member.</p> <p>Training may involve formal classroom sessions/courses as well as hands-on practical instruction as part of the staff member's duties and will involve refresher training as required. All relevant training should be recorded. SEPA expects that for most organisations, there should be a matrix of training compared against the general duties of each staff member, task or post.</p>	<p style="text-align: center;">Guidance</p>

<p>A.5.2 <i>You must ensure that anyone carrying out duties that may affect compliance with your authorisation has access to a copy of your authorisation and all relevant procedures and records that are necessary to ensure compliance with your authorisation.</i></p>	<p style="text-align: center;">Condition</p>
<p>This condition supports IAEA GSR part 3 requirement 26, Article 8 of the SFRWD and Article 14(1) of the BSSD.</p> <p>In order to ensure compliance with your Authorisation, it is necessary that all relevant staff have access to the Authorisation and all relevant procedures and records that are necessary to ensure compliance.</p>	<p style="text-align: center;">Reason</p>
<p>This is essentially a replacement for section 19 of RSA93, which required display of your certificate of registration or authorisation. For security reasons, it has not always been feasible to display these documents in public.</p> <p>The information can be held in paper or electronic format.</p>	<p style="text-align: center;">Guidance</p>

## A.6 Facilities and equipment

<p>A.6.1 <i>You must provide suitable facilities and equipment that are necessary to ensure compliance with your authorisation.</i></p>	<p>Condition</p>
<p>This condition supports IAEA GSR part 3 requirement 13 and Article 68(b) of the BSSD. Suitable facilities, systems and equipment must be provided for the management of radioactive substances in order to achieve and maintain an optimal level of protection of the environment and the population and to minimise the potential for the generation of unnecessary radioactive waste.</p>	<p>Reason</p>
<p>SEPA does not specify what facilities and equipment are needed for managing your radioactive substances as you are the best person to make this decision. You should consider what “hardware” is needed, including but not limited to floors, ceilings, walls, furniture, waste bins, tanks, pipework, ducting, sinks and fume hoods used in conjunction with the radioactive substances as well as any items that contribute to BPM (e.g. filters). The use of the word “provided” rather than “used” is intended to ensure that any back-up systems are maintained to the same level as those in use at any particular time.</p>	<p>Guidance</p>
<p>A.6.2 <i>You must have and comply with appropriate arrangements for the acceptance into service of all facilities and equipment that are provided to ensure compliance with your authorisation.</i></p>	<p>Condition</p>
<p>This condition supports IAEA GSR part 3 requirement 13 and Article 68(b) of the BSSD. It is essential that all facilities and equipment involved in radioactive substances have been designed, constructed, modified or chosen to fulfil appropriate criteria and will function correctly once used or installed. Failure to meet these criteria may result in loss of control of the radioactive substances and the potential for an unplanned exposure to a member of the public, harm to the environment or the generation of unnecessary radioactive waste.</p>	<p>Reason</p>
<p>SEPA expects that you will have in place procedures for establishing acceptance criteria and checking the suitability of all facilities and equipment prior to their first use and subsequent to any maintenance activity to ensure that they perform effectively and as intended. The acceptance criteria and required checks should be commensurate with the risk posed by the radioactive substances. The checks could include the manufacturer’s critical examination, calibration certificates, and a ‘dry run’ of a process or a formal commissioning programme.</p> <p>SEPA expects that the acceptance criteria and any checks made will be recorded and available for inspection, even if they are conducted by another part of your organisation (e.g. Facilities Department) or an external party (e.g. RWA, contractor).</p>	<p>Guidance</p>

<p>A.6.3 <i>You must ensure that all facilities and equipment provided to ensure compliance with your authorisation are:</i></p> <ul style="list-style-type: none"> <li>(a) <i>maintained in good repair;</i></li> <li>(b) <i>regularly calibrated (where relevant);</i></li> <li>(c) <i>checked to ensure they are serviceable and effective; and</i></li> <li>(d) <i>being correctly used.</i></li> </ul>	Condition
<p>This condition supports IAEA GSR part 3 requirement 4 and Article 68(c) of the BSSD.</p> <p>All measuring and monitoring equipment must be working correctly and effectively so that the quantities and nature of any radioactivity detected is accurate. This will minimise the risk of an unplanned exposure of a member of the public, harm to the environment or the generation of unnecessary waste.</p>	Reason
<p>The complexity and frequency of the inspection and repair regime should be commensurate with the risk posed by the radioactive substances and the environment they operate within. This may include service contracts for relevant equipment such as liquid scintillation counters or fume hood systems, regular audits by the RWA, a formal maintenance schedule or a combination of these. You will need to be prepared to justify the approach to maintenance for the facilities and equipment, and it may be necessary to record this justification.</p> <p>SEPA expects that these inspections, and any discrepancies found, will be recorded and available for inspection, even if they are conducted by another part of your organisation (e.g. Facilities Department) or an external party (e.g. RWA, contractor). It is recommended that any corrective actions taken, and the date they were taken on, are also recorded.</p> <p>Whilst minor repairs are expected to be carried out relatively quickly, it is recognised that substantial repairs may take longer to finance and arrange. In these cases, SEPA expects that you will provide an implementation plan for the carrying out of the required repairs, along with dates for any milestones as well as the projected completion date.</p> <p>You should have a programme of calibration and routine checking for all measuring instruments set out in relevant procedures. It is essential that the measuring instruments are calibrated against the radionuclides present in the radioactive substances being used or disposed of. Calibration records and records of routine checks (e.g. use of standards) on monitoring equipment should be kept and made available during inspection.</p> <p>In addition, the procedures should specify the correct manner in which the measuring instruments are to be used. Staff using the measuring instruments must be trained in the procedures and the correct manner for use of the measuring instruments. It is recommended that you keep a record of the staff trained to use the measuring instruments and provides refresher training as required.</p>	Guidance

## A.7 Sampling, measurements, tests, surveys and calculations

<p>A.7.1 <i>You must take samples and conduct measurements, tests, surveys, analyses and calculations as necessary in order to determine compliance with the requirements of your authorisation.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirement 14 and Article 67(1) of the BSSD.</p> <p>It is your responsibility to actively take samples and carry out measurements et al as necessary to characterise your radioactive substances and to demonstrate compliance with all the requirements of your Authorisation. This is particularly important with regard to radioactive substances since it is impossible to directly detect radioactivity using human senses alone. Undetected radioactive substances or contamination may cause an unplanned exposure of a member of the public or harm to the environment and could generate unnecessary radioactive waste requiring disposal.</p>	Reason
<p>You (with the RWA with regard to radioactive waste) should have carried out an assessment to determine what sampling, measurement, tests, surveys and calculations are needed to fully characterise your radioactive substances and determine compliance with your Authorisation requirements.</p> <p>The number, frequency and type of sample, measurement, etc. is dependent on a variety of factors including the nature of the radioactive substances (i.e. sealed or unsealed), the method of its storage and the manner in which it is used. It may also be necessary to consider the non-radioactive properties of the radioactive substances, particularly if they are hazardous.</p> <p>This information should be written down and included in the procedures relating to sampling, measurement etc. The results of all sampling, measurements etc. must be recorded and be available for inspection by SEPA.</p>	Guidance

<p>A.7.2 <i>You must use the best practicable means when taking samples or conducting measurements, tests, surveys and calculations.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirement 14 and Articles 5(b) and 29(3) of the BSSD.</p> <p>Because radioactive substances cannot be directly detected by human senses, it is critical that you are using best practicable means in sampling and conducting measurements et al to ensure that the risks of an unplanned exposure to a member of the public, harm to the environment or generation of unnecessary waste are minimised.</p>	Reason
<p>You (in conjunction with the RWA with regard to radioactive waste), are responsible for determining the best methods for carrying out this requirement and ensuring that it remains up to date with regard to advances in scientific and technical understanding.</p> <p>SEPA expects that the justification of BPM with regard to taking samples and carrying out measurements et al will be documented and that it will be periodically reviewed by you/your RWA to ensure it remains valid. This expectation does not require separate BPM documentation, and it may be incorporated into other procedures or written arrangements.</p> <p>For further generic guidance on BPM, refer to the SEPA document “Satisfying the ALARA requirements and the role of Best Practicable Means”, available from SEPA’s website.</p>	Guidance

## A.8 Provision of information and data returns

<p>A.8.1 <i>You must make available without unreasonable delay all records and written procedures relating to the activities authorised by your authorisation when required by SEPA.</i></p>	<p>Condition</p>
<p>This condition supports IAEA GSR part 3 requirement 32.</p> <p>SEPA must have access to your written arrangements/procedures and the relevant records since these are the principle means of determining compliance with the Authorisation.</p>	<p>Reason</p>
<p>You are required to have written arrangements that detail how he will comply with your Authorisation as well as records that demonstrate compliance with the Authorisation. It is essential that SEPA can access these documents in order to determine if the written arrangements and records exist and whether they are comprehensive enough to demonstrate compliance with your Authorisation.</p> <p>SEPA is not required to put the request to see the records or procedures in writing. It can be made verbally during an inspection.</p>	<p>Guidance</p>

<p>A.8.2 <i>You must provide SEPA with the relevant information specified in Schedule 2 of these Standard Conditions within the specified timescales.</i></p>	<p>Condition</p>
<p>This condition supports IAEA GSR part 3 requirement 32.</p> <p>SEPA requires the ability to formally request information from you at any time. In the event that a formal request for information is not complied with, it can be considered a contravention of the Authorisation and appropriate enforcement action can be taken.</p>	<p>Reason</p>
<p>SEPA expects that, in most circumstances, information will be provided by you without the need for a formal written request. However, information can be requested at any time by formally writing to you. The request will stipulate timescales for provision of the information as well as specifying if there is a particular format that the records must be provided.</p> <p>SEPA may require other relevant information not included in the specified data returns within the Authorisation. The situations that may give rise to this request include information relating to an event involving the authorised radioactive substances or information to carry out a periodic review of the Authorisation.</p> <p>In the event you feel that a request for information is unreasonable, the matter should be brought to the attention of the SEPA inspector in the first instance. If that fails to resolve the matter, you should follow SEPA's Complaints Handling Procedure, available on SEPA's website.</p>	<p>Guidance</p>

## A.9 Contraventions of your authorisation

<p>A.9.1 <i>You must inform SEPA by telephone without delay if you believe that you (or anyone else) are contravening, has contravened or might contravene a requirement of your authorisation.</i></p>	<p style="text-align: center;">Condition</p>
<p>This condition supports IAEA GSR part 3 requirement 16 and Articles 85(3), 86(4) and 96(b) of the BSSD.</p> <p>Non-compliance events must be reported to SEPA without delay in order to allow us to take our own measures to ensure that there is not an unplanned exposure of a member of the public, harm to the environment or the generation of unnecessary radioactive waste. The notification also allows SEPA to begin its own investigation into the matter, and it also allows us to comply with any international reporting obligations.</p>	<p style="text-align: center;">Reason</p>
<p>It is difficult to demonstrate compliance with this condition unless an event of this nature has occurred. SEPA expects you to have measures in place to respond to this type of event, many of which will be written down for other purposes (e.g. local rules), and this can be used as demonstration of compliance.</p> <p>It is important to note that this condition also requires notification of SEPA of non-compliance events that <u>might</u> occur. Delaying the notification until the non-compliance is confirmed to have occurred is unacceptable. All staff involved in the management of radioactive substances should be aware of this requirement and be empowered to make the notification or escalate the matter to the appropriate person in your organisation in order for the notification to be made to SEPA.</p> <p>Contact details for SEPA can be found in Appendix 1.</p>	<p style="text-align: center;">Guidance</p>
<p>A.9.2 <i>Where you have informed SEPA that you have contravened your authorisation, you must:</i></p> <ul style="list-style-type: none"> <li>(a) <i>Confirm the information given in the telephone notification in writing by the next working day after the verbal notification;</i></li> <li>(b) <i>Carry out an investigation into the circumstances to identify any necessary corrective measures to avoid such events in the future;</i></li> <li>(c) <i>Record the results of your investigation;</i></li> <li>(d) <i>Ensure that any corrective measures are carried out as soon as reasonably practicable; and</i></li> <li>(e) <i>Send the results of your investigation to SEPA as soon as reasonably practicable.</i></li> </ul>	<p style="text-align: center;">Condition</p>
<p>This condition supports IAEA GSR part 3 requirement 16 and Articles 85(3), 86(4) and 96(b) of the BSSD.</p> <p>This condition requires you to provide a record of the lifecycle of the event and to demonstrate that you have investigated the event and have put in place corrective measures to avoid a repeat of the non-compliance.</p>	<p style="text-align: center;">Reason</p>

<p>Written confirmation of the contravention may be provided by email. Contact details for SEPA can be found in Appendix 1.</p> <p>“As soon as reasonably practicable” has been used in order to allow you to conduct a thorough investigation and identify the root cause and any necessary corrective measures needed to prevent a recurrence of the contravention. It is recommended that you provide SEPA an indication of the length of time you expect the investigation to take within the written confirmation.</p>	Guidance
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## A.10 Ceasing your activity and leaving the authorised place

<p><i>A.10.1 You must notify SEPA of the following circumstances by providing the information set out in the relevant section of Schedule 3 of these Standard Conditions:</i></p> <p style="margin-left: 40px;"><i>(a) If you vacate the authorised place, or in the case of Mobile Radioactive Sources, vacate the place where they are normally kept; or</i></p> <p style="margin-left: 40px;"><i>(b) Cease to carry on your authorised activities.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirement 29 and Article 96(b) of BSSD.</p> <p>This notification minimises the risk of radioactive substances being abandoned or radioactive contamination being left unremediated on the Authorised Place. Abandoned radioactive substances and/or unremediated radioactive contamination can result in an unplanned exposure to a member of the public, harm to the environment or the generation of unnecessary radioactive waste.</p>	Reason
<p>It is difficult to demonstrate compliance with this condition unless you intend to leave the Authorised Premises or cease to carry out your activity. SEPA recommends that these eventualities are captured in your management arrangements along with the requirement to contact SEPA as demonstration of compliance.</p> <p>Contact details for SEPA can be found in Appendix 1.</p>	Guidance

## B. ALL RADIOACTIVE SUBSTANCES REGULATED ACTIVITIES

### B.1 Overarching requirement

<p><i>B.1.1 You must carry out the authorised radioactive substances activities in a manner that achieves and maintains an optimal level of protection of the environment and the population.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirements 4, 11, 15, 29 and 30 and Articles 5(b), 29(3) and 68(a) of the BSSD.</p>	Reason
<p>For further guidance on optimisation, please see the SEPA document “Satisfying the ALARA requirements and the role of Best Practicable Means”, available from SEPA’s website.</p>	Guidance

## B.2 Radioactive waste optimisation

<p><i>B.2.1 You must use the best practicable means to ensure that no unnecessary radioactive waste is generated.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirements 1 and 11, Articles 5(b), 29(3) and 68(a) of the BSSD and Article 4(3)(a) of the SFRWD.</p> <p>Where radioactive waste production cannot be avoided, BPM must be used to minimise the activity and volume of the radioactive waste generated. Waste reduction is an important step in radioactive waste management and controlling potential risk of an unplanned exposure to a member of the public or harm to the environment.</p>	Reason
<p>For further guidance on optimisation, please see the SEPA documents “Satisfying the ALARA requirements and the role of Best Practicable Means” and “Basic principles of radioactive waste management”, available from SEPA’s website.</p>	Guidance

<p><i>B.2.2 If you generate radioactive waste, you must use the best practicable means to minimise the volume of and total radioactivity of radioactive waste that requires disposal.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirements 1 and 11, Articles 5(b), 29(3) and 68(a) of the BSSD and Article 4(3)(a) of the SFRWD.</p> <p>This rule places the general BPM requirements directly on the disposal routes and radioactive waste types set out in the Authorisation. It also specifically states that the radiological effects of concern to the Authorisation are those to members of the public and to the environment.</p>	Reason
<p>For further guidance on optimisation, please see the SEPA documents “Satisfying the ALARA requirements and the role of Best Practicable Means” and “Basic principles of radioactive waste management”, available from SEPA’s website.</p>	Guidance

<p><i>B.2.3 You must optimise your approach to radioactive waste management taking account of all waste streams and disposals expected from current and future operations.</i></p>	Condition
<p><i>This condition supports IAEA GSR part 3 requirements 1 and 11, Article 4(3)(a) of the SFRWD and Articles 5(b), 29(3) and 68(a) of the BSSD.</i></p> <p><i>This rule ensures that you adopt a balanced approach to managing the radioactive wastes that will be generated throughout the lifetime of the radioactive substances activity that you are carrying out.</i></p>	Reason

<p>SEPA expects you to have considered the generation of radioactive wastes throughout the lifecycle of the activity, including when you cease undertaking the activity. In addition, during decommissioning of the Authorised Place, both radioactive and non-radioactive waste will be generated. All of these wastes should be managed using Best Practicable Means.</p> <p>For further guidance on optimisation, please see the SEPA documents “Satisfying the ALARA requirements and the role of Best Practicable Means” and “Basic principles of radioactive waste management”, available from SEPA’s website.</p>	Guidance
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### B.3 Prohibition of deliberate dilution

<p><i>B.3.1 You must not deliberately dilute radioactive substances in order to release them from regulatory control unless:</i></p> <p style="margin-left: 40px;"><i>(a) the dilution takes place in normal operations where radioactivity is not a consideration; or</i></p> <p style="margin-left: 40px;"><i>(b) the dilution is a result of mixing radioactive waste with non-radioactive material for the purposes of re-use or recycling that is authorised by your authorisation.</i></p>	Condition
<p>This condition supports Article 30(4) of the BSSD.</p> <p>The dilution of radioactive waste will generate additional volume of radioactive waste that will require disposal, even if it can be done such that the waste is no longer considered to be radioactive. This does not accord with the principles of optimisation.</p>	Reason
<p>This condition does not prohibit deliberate dilution altogether. It prohibits deliberate dilution to remove the radioactive substance from regulatory control, except in specific situations, where this has been authorised in your permit.</p> <p>SEPA expects any dilution to be optimised, and we would strongly recommend that you discuss your plans with us before you undertake any dilution.</p>	Guidance

### B.4 Receipt of radioactive waste from another person

<p><i>B.4.1 You may only receive radioactive waste that is described in your authorisation</i></p>	Condition
<p>This is an enabling condition that authorises you to receive radioactive waste from another person, but only if it has been specifically authorised in your permit.</p>	Reason
<p>If there is nothing specified in your authorisation, you are not allowed to receive radioactive waste from another person. Usually, there will be a number of bespoke conditions associated with this (e.g. Waste Acceptance Criteria).</p>	Guidance

## B.5 Safe management of radioactive substances

<p><i>B.5.1 You must manage radioactive substances in a manner that prevents the unauthorised or reckless dispersal of radionuclides and, in the case of a sealed source, which prevents any dispersal of radionuclides.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirements 15 and 17, Articles 4(3)(c) and 7(3) of the SFRWD and Articles 68(a), 85(1) and 86(1) of the BSSD.</p> <p>You must manage radioactive substances appropriately to avoid cross-contamination of other items and thereby minimise the risk of generating unnecessary radioactive waste, causing an unplanned exposure to a member of the public or harm to the environment.</p> <p>The difference between unsealed and sealed sources has been introduced since there can be intentional dispersal of unsealed sources as part of the work undertaken (e.g. injection into a patient, use of an environmental tracer); however, sealed sources have been designed and constructed to prevent any release.</p>	Reason
<p>This conditions covers everything that could prevent an unauthorised dispersal of the radioactive substances or an unintentional public exposure, including but not limited to its radioactive characteristics (e.g. activity, type of radioactivity), its physical state (e.g. liquid, gas, solid), possible non-radioactive hazardous properties (e.g. flammable), the immediate container or device holding it, the area where it is kept, signage and labelling to indicate its presence and what other substances are stored next to or in the vicinity of it.</p> <p>For sealed sources, the demonstration that the radionuclide(s) have not been dispersed is usually by way of a periodic wipe test.</p> <p>Further generic guidance can be obtained from the IAEA suite of documents.</p>	Guidance
<p><i>B.5.2 Unless your authorisation allows otherwise, you must not release radioactive materials into the environment or introduce radioactive materials into organisms that will leave the authorised place whilst containing that substance.</i></p>	Condition
<p>This is an enabling condition that prevents you from releasing radioactive material into the environment or introducing radioactive materials into organisms that leave the authorised place unless you have been specifically authorised in your permit.</p> <p>The intention is to ensure that the same requirements apply to the release of radioactive material as to the discharge of radioactive waste.</p>	Reason
<p>Please note that this conditions relates to radioactive <u>material</u>. It does not prevent you from discharging radioactive waste, as this is separately authorised.</p>	Guidance
<p><i>B.5.3 You must manage radioactive substances safely and securely to prevent unauthorised use, loss and theft.</i></p>	Condition

<p>This condition supports IAEA GSR part 3 requirements 15 and 17, the IAEA Code of Conduct of the Safety and Security of Radioactive Sources, Article 7(3) of the SFRWD and Article 65(1)(d) of the BSSD.</p> <p>You must effectively restrict access to the radioactive substances in order to prevent loss, theft or unauthorised use of the radioactive substances. The unauthorised use, loss or theft of the radioactive substances may ultimately result in an unplanned exposure of a member of the public, harm to the environment or the generation of unnecessary radioactive waste.</p>	Reason
<p>The objective of access control is to ensure that only authorised users have access to the radioactive substances. Access controls may include a combination of physical (e.g. doors, fences, walls, cages, locks/interlocks and shielded containers), electronic and administrative measures (e.g. procedures), although preference should be given, where practicable, to engineering controls over administrative controls. The principles of defence in depth should also be taken into account and all controls should be commensurate with the hazard posed by the radioactive substance.</p> <p>In addition, it is recommended that a system of detection, assessment and response is established to determine if the access control measures have been breached and to ensure that any such event is appropriately investigated.</p> <p>Further advice on physical security measures can be obtained from the CPNI website.</p>	Guidance

<p><i>B.5.4 You must regularly verify that radioactive substances and where relevant the equipment or containers holding radioactive substances are still present and in good repair.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirements 1 and 11, the IAEA Code of Conduct of the Safety and Security of Radioactive Sources and Articles 85(1) and 86(1)(2) of the BSSD</p> <p>This ensures that the radioactive substances are routinely accounted for and that any missing source is identified as soon as possible. This minimises the risk of the radioactive substances (or their containers or immediate housing) becoming damaged or being disposed of in an inappropriate manner. It also requires routine verification that the radioactive substances/containers/equipment are in good condition and that any damage is identified at the earliest opportunity so that measures can be taken to mitigate any potential release of radioactivity which could cause an unplanned exposure to a member of the public, harm to the environment or generate unnecessary waste.</p>	Reason

<p>The requirement to verify the continued presence of the radioactive substances may overlap with those of other legislation (e.g. IRR17).</p> <p>Verification checks should be conducted at a frequency commensurate with the risk and likelihood of loss, theft or damage to ensure that the radioactive substances are present and have not been tampered with. In general, SEPA expects that the minimum frequency for fixed sealed sources to be monthly.</p> <p>Such checks could include physical checks that the source is in place, remote observation through CCTV, verification of seals or other tamper evident devices and measurements of radiation or other physical phenomena that would provide assurance that the radioactive substances are present. For sealed sources, periodic wipe tests should provide demonstration that the source remains in good repair.</p> <p>For sealed sources in use, verifying that the device or equipment containing the sealed source is functional may be sufficient. Changes to the manner of keeping or use (e.g. shutdown of the plant to which the sealed source is attached for periodic maintenance) or following any incident in which damage could occur to the sealed source, source container or associated equipment, should also trigger a check. It is recognised that the source container may have shorter lifespan than the source itself. In such cases, it may be necessary to undertake wipe tests at a greater frequency.</p> <p>Records of these verifications, wipe tests and any maintenance activities, as well as any correction actions taken in response to any issues found, must be kept and be available for inspection as demonstration of compliance with this condition.</p>	Guidance
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<p><i>B.5.5 Where reasonably practicable, you must ensure that radioactive substances or their immediate containers are adequately and legibly marked or labelled to indicate their radioactive content.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirements 15 and 17 and Articles 7(3) of the SFRWD.</p> <p>Radioactive substances needs to be suitably marked with enough information to allow the hazards to be readily identified and to minimise the risk of losing control of the radioactive substances and causing an unplanned exposure to a member of the public, harm to the environment or the generation of unnecessary radioactive waste.</p>	Reason

<p>The marking should include, as a minimum, a trefoil and a unique reference.</p> <p>Where it is not practical to mark the authorised radioactive substances (e.g. it is a powder or liquid) or the authorised radioactive substance is contained within an item or piece of equipment (e.g. NORM contamination of a valve), the container, item or piece of equipment should display the marking or labelling.</p> <p>In the case of sealed sources, the manufacturer may have already assigned a unique identifier. If this is not the case, then you must assign an identifier upon receipt of the sealed source.</p> <p>It is strongly recommended that the identification on the authorised radioactive substance, container, item or piece of equipment is robust enough to survive normal handling and the storage environment whilst remaining legible.</p> <p>It is also possible that the item or piece of equipment containing the authorised radioactive substances has been assigned its own unique identifier as part of your asset management programme. It is imperative that these two identifiers are kept separate in order to prevent confusion.</p> <p>In the event that a marked container is no longer used for storing radioactive substances, or that the authorised radioactive substances have been removed from an item or piece of equipment, and there is no contamination present, all markings and labels should be removed as soon as possible to avoid confusion as to the contents.</p>	Guidance
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## B.6 Contamination control and remediation

<p><i>B.6.1 If there are grounds for believing that an unauthorised dispersal of radioactive substances has occurred, you must immediately take all necessary measures to prevent (or where that is not practicable, to restrict) any further dispersal.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirements 15, 17 and 31 and Article 7(3) of the SFRWD.</p> <p>Once suspected, you must take all necessary measures to prevent or minimise the further dispersal of any radioactive substance. The longer the period that the radioactive substances remain dispersed in an uncontrolled manner, the greater the risk of an unplanned exposure of a member of the public, harm to the environment or the generation of additional radioactive waste requiring disposal.</p>	Reason
<p>This condition does not apply to historic spills or contaminated land.</p> <p>You should be ready and able to instigate the measures without delay. Staff involved in work with the radioactive substances should be trained and empowered to take the necessary measures without direction.</p> <p>The measures to be taken should be commensurate with the risk posed by the radioactive substances that have been dispersed. For example, it may be acceptable to barrier off an area where a spill of a short-lived radionuclide has occurred in order to allow it to decay away. The non-radioactive properties of the dispersed radioactive waste should also be taken into account when planning measures.</p> <p>SEPA expects that any equipment or substances needed to prevent or minimise further dispersion and to clean up the dispersed radioactive substances, such as spill kits, special vacuum cleaners and decontamination fluids, are readily available, are in sufficient quantity for any foreseeable event and are in good working order.</p>	Guidance

<p><b>B.6.2</b> <i>If there is an unauthorised dispersal of radioactive substances, you must:</i></p> <p>(a) <i>use the best practicable means to remediate any radioactive contamination arising either on or off the authorised place; and</i></p> <p>(b) <i>carry out the remediation as soon as reasonably practicable.</i></p>	Condition
<p>This rule supports IAEA GSR part 3 requirements 15, 17 and 31, Articles 5(b) and 29(3) of the BSSD and Article 7(3) of the SFRWD.</p> <p>SEPA's expectation is that remediation efforts must be optimised in all such circumstances. Radioactive contamination that is not remediated may result in an unplanned exposure to a member of the public, harm to the environment or the generation of unnecessary radioactive waste.</p>	Reason
<p>It is difficult to demonstrate compliance with this rule unless an event of this nature (e.g. spill, leak or accident) has occurred. SEPA expects you to have measures in place to respond to this type of event, many of which will be written down for other purposes (e.g. local rules) and these documents can be used as demonstration of compliance.</p> <p>Prompt decontamination of any such contaminated areas will minimise the risk of creating 'legacy' contaminated sites, (e.g. in the event you go out of business). However, SEPA recognises that "as soon as reasonably practicable" could mean years, provided that you can justify that the delay was BPM.</p> <p>For further guidance on optimisation, please see the SEPA document "Satisfying the ALARA requirements and the role of Best Practicable Means", available from SEPA's website.</p>	Guidance

## B.7 Treatment of radioactive waste

<p><b>B.7.1</b> <i>You must only treat radioactive waste where this represents the best practicable means for the management of the waste.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirement 11, Article 5(b) of the BSSD, the UK Low Level Waste Policy and Scotland's Higher Activity Waste Policy.</p> <p>You are now authorised to undertake treatment of radioactive waste, but only where this treatment is optimised.</p>	Reason
<p>Treatment can involve physical, chemical or biological processes.</p> <p>SEPA expects you to undertake simple forms of treatment, such as segregation, both at the point of generation and subsequently, as well as simple forms of decontamination as a matter of course. More complex forms of treatment (e.g. filtration, ion exchange) will need to be considered in terms of BPM.</p> <p>Except for the simpler forms of treatment, SEPA expects you to write down the justification for any treatment undertaken and have this available for inspection.</p> <p>For further guidance on optimisation, please see the SEPA document "Satisfying the ALARA requirements and the role of Best Practicable Means", available from SEPA's website.</p>	Guidance

## B.8 Holdings of radioactive substances

<p><i>B.8.1 You must hold the minimum quantity of radioactive materials that are necessary to carry out your activity.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirements 11, 15 and 30. It limits the generation of unnecessary radioactive waste by requiring you to only hold the minimum necessary to carry out your activity. It also supports the optimisation principle.</p>	Reason
<p>Please note this only applies to radioactive <u>material</u>. You may have radioactive material limits set out in your permit. This condition requires you to hold the minimum over and above these limits.</p>	Guidance

<p><i>B.8.2 You must ensure that the quantity of radioactive substances you hold does not exceed any limits set out in your authorisation.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirements 15 and 30 and Articles 29(3) and 65 (2) of BSSD. This is an enabling condition that ensures you do not exceed any limits set out in your authorisation.</p>	Reason
<p>If no limits have been set for this in your permit, then there is no limit on the amount you can hold of either radioactive material or waste.</p>	Guidance

<p><i>B.8.3 You must transfer or dispose of radioactive waste as soon as reasonably practicable after it has become waste.</i></p>	Condition
<p>This rule supports IAEA GSR part 3 requirements 15 and 30, Articles 5(b), 29(3) and 68 (a) of the BSSD and the UK Low Level Waste Policy. The storage period for radioactive waste on the Authorised Premises must be kept as short as practicable in order to minimise the risk of you losing control of the radioactive waste and potentially causing an unplanned exposure to a member of the public, harm to the environment or the generation of unnecessary radioactive waste.</p>	Reason

<p>Wastes may be accumulated for decay storage, to meet certain conditions for disposal (e.g. tidal windows), pending arrangements for uplift by a contractor or if justified as part of the waste management plan for that waste (e.g. decommissioning waste).</p> <p>SEPA recognises that there are economies of scale in accumulating sufficient radioactive waste in order to financially justify the cost of uplift and disposal. However, the long-term storage of radioactive waste without disposal or transfer, for example on the basis of cost of disposal, is generally not acceptable. There should be a presumption towards early solutions for all waste streams, although it is noted that early solutions do not necessarily mean early disposal.</p>	Guidance
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## B.9 Waste management plan

<p><i>B.9.1 You must prepare, maintain and implement a management plan for waste arising from your activities involving radioactive substances and the decommissioning of associated facilities and equipment.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirement 31, Article 7(3) of the SFRWD and the UK's Low Level Waste Policy.</p> <p>This rule ensures that you have a plan for the management of all radioactive substances that may be present or be generated throughout the lifetime of carrying out your activities. It must also include radioactive waste generated as part of decommissioning when you are no longer carrying out the activities in order to reduce the potential for radioactive substances or contaminated items being abandoned.</p>	Reason
<p>The waste management plan can be in either paper or electronic form and should be available for inspection by SEPA. It should be periodically reviewed and updated to reflect the current status of all facilities and equipment associated with the radioactive substances.</p> <p>For sealed source permits, the plan should cover, as a minimum, the disposal of all the sources and associated equipment (e.g. gauges, transport containers, etc.) when you cease carrying on your activities.</p> <p>For non-nuclear authorisations, the plan should consist of, as a minimum, the disposal routes for all operational radioactive waste streams and the list of contaminated items currently being held on site.</p> <p>For nuclear permits, the requirements for the plan are set out in the joint agencies' document "General Requirements for Revocation", available on SEPA's website.</p> <p>For further information on decommissioning, see the IAEA Safety Standards document "Decommissioning of Facilities (GSR Part 6)"</p>	Guidance

## B.10 Lost and stolen radioactive substances

<p><i>B.10.1 If there are grounds for believing that any radioactive substances have been lost or stolen, you must:</i></p> <ul style="list-style-type: none"> <li><i>(a) immediately verify if this is the case;</i></li> <li><i>(b) take all reasonably practicable measures to recover them; and</i></li> <li><i>(c) inform the relevant police force and SEPA by telephone without delay.</i></li> </ul>	Condition
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<p>This condition supports IAEA GSR part 3 requirement 15, Article 7(3) of the SFRWD and Article 96(b) of the BSSD.</p> <p>The longer the period that radioactive substances are in an uncontrolled state, the greater the risk of it potentially causing an unplanned exposure to a member of the public, harm to the environment or generating unnecessary radioactive waste. This rule ensures that you cannot ignore potentially significant unintentional dispersal of radionuclides or lost or stolen radioactive substances.</p>	Reason
<p>It is difficult to demonstrate compliance with this rule unless an event of this nature has occurred. SEPA expects you to have measures in place to respond to this type of event, many of which will be written down for other purposes (e.g. local rules).</p> <p>The measures to recover the lost/stolen radioactive substances should be put into effect immediately when you suspect this may be the case. Your staff should have adequate training to initiate emergency procedures in these circumstances and be empowered to raise the alarm. You may need to also contact your RPA/RWA for further advice.</p> <p>Contact details for SEPA can be found in Appendix 1.</p>	Guidance

## B.11 Radioactive Waste Advisers

<p><i>B.11.1 Except where your authorisation only relates to sealed sources, you must appoint, retain and consult with suitable Radioactive Waste Advisers to advise on compliance with your authorisation, including but not limited to:</i></p> <ul style="list-style-type: none"> <li><i>(a) Achieving and maintaining an optimal level of protection of the environment and the population;</i></li> <li><i>(b) Accepting into service adequate equipment and procedures for measuring or assessing exposure of members of the public and radioactive contamination of the environment;</i></li> <li><i>(c) Checking the effectiveness and maintenance of equipment for measuring or assessing exposure of members of the public and radioactive contamination of the environment; and</i></li> <li><i>(d) Ensuring the regular calibration of measuring instruments.</i></li> </ul>	Condition
<p>This condition supports Articles 14(1), 34, 68(d) and 82(2) of the BSSD and Article 8 of the SFRWD.</p> <p>It establishes the requirement for you to have and consult with a certified Radioactive Waste Adviser in respect of the listed duties.</p>	Reason
<p>SEPA recognises anyone who holds a current valid certificate of recognition issued by an Approved Assessing Body as an RWA. It is your responsibility to determine whether a recognised RWA is suitable to advise on your business and the types of radioactive waste you will produce, store and dispose of.</p> <p>It is recommended that all formal correspondence with the RWA is kept and available for inspection as demonstration of compliance with this condition.</p> <p>Further information can be obtained in the joint agencies' documents "Environment Agencies' Guidance on Roles and Responsibilities of Permit Holders and RWA" and "Environment Agencies' Guidance on Suitability of RWA", available on the SEPA website.</p>	Guidance

<p><i>B.11.2 You must appoint the Radioactive Waste Adviser in writing and include the scope of advice they are required to give.</i></p>	Condition
<p>This condition supports Articles 14(1), 34, 68(d) and 82(2) of the BSSD and Article 8 of the SFRWD.</p> <p>The appointment of an RWA must be formalised and include the scope of advice the RWA is required to give.</p>	Reason
<p>The letter of appointment and any documentation detailing the scope of advice the RWA is required to give, if separate from the letter of appointment, should be available for inspection as demonstration of compliance with this condition.</p> <p>Further information can be obtained in the joint agencies' documents "Environment Agencies' Guidance on Roles and Responsibilities of Permit Holders and RWA" and "Environment Agencies' Guidance on Suitability of RWA", available on the SEPA website.</p>	Guidance

## C. TRANSFERS OF RADIOACTIVE SUBSTANCES

### C.1 Duty of care

<p><i>C.1.1 You must not transfer radioactive substances to any person who is not legally entitled to receive and manage them.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirement 15 and Article 29(3) of the BSSD.</p> <p>This condition helps to establish a Duty of Care system for the transfer of both radioactive material and radioactive waste.</p>	Reason
<p>Within the UK, this will usually be the holding of an authorisation under EASR18 (Scotland), a permit under EPR16 (England or Wales) or a registration/authorisation under RSA93 (Northern Ireland).</p> <p>Sealed sources can also be returned to the manufacturer or to the supplier.</p> <p>For receiving sites outside of the UK, there may not be a comparable licensing system. In these circumstances, you must satisfy yourself that the receiving site has all the permissions required by that country for the receipt and management of the radioactive substance.</p> <p>The regulation of the transportation of radioactive waste falls outside of SEPA's remit. The Office for Nuclear Regulation (ONR) is the regulator in relation to both road and rail transport, whilst the Civil Aviation Authority regulates transport by air and the Marine and Coast Guard Agency regulates the transport by sea. Carriage of dangerous goods, including radioactive substances, is regulated internationally by agreements and European Directives, with biennial updates of the Directives to take account of technological advances.</p>	Guidance

## C.2 Transfer procedure

<p><i>C.2.1 You must produce and retain a true and accurate description of the radioactive substances to be transferred (the transfer record) which contains, as a minimum, the information set out in Schedule 1 of these Standard Conditions.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirement 3, Article 7(3) of the SFRWD and article 29(3) of the BSSD.</p> <p>It helps establish a Duty of Care for both radioactive material and radioactive waste. It ensures that you produce and keep an accurate record of the radioactive substances being transferred.</p>	Reason
<p>Please note that disposing of radioactive waste in normal refuse (commonly referred to as Dustbin Disposal) is not a transfer and does not require a transfer record.</p> <p>The record is important in the event there is an incident in transporting the radioactive substances and in confirming the nature of it to the person transporting it as well as the person receiving it.</p> <p>In addition to the radionuclide content and radioactivity of the material or waste, it may also be necessary to establish its non-radioactive properties, especially if these properties are hazardous.</p> <p>It is recommended that you do not sign the record until the consignment is being uplifted in order to ensure that the record is accurate and there were no last minute additions or deletions from the consignment. However, it is your responsibility to ensure that it contains sufficient information to satisfy this requirement.</p> <p>The use of multi-page, carbonised consignment notes can facilitate this requirement, although their use is not mandatory. Blank copies of the records may also be provided by the person receiving the waste (or his carrier) in order to facilitate the transfer.</p>	Guidance
<p><i>C.2.2 Before transferring any radioactive substances to another person, you must:</i></p> <p style="margin-left: 40px;"><i>(a) confirm that that person agrees to receive them; and</i></p> <p style="margin-left: 40px;"><i>(b) give to that person a copy of the transfer record.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirement 3, Article 7(3) of the SFRWD and article 29(3) of the BSSD.</p> <p>It helps to establish a Duty of Care system for both radioactive material and radioactive waste. It ensures that you are able to satisfy yourself that the receiving site has agreed to receive your material or waste before and you have received confirmation that the radioactive substances are acceptable for transfer before they have left the authorised place.</p>	Reason
<p>Please note that disposing of radioactive waste in normal refuse (commonly referred to as Dustbin Disposal) is not a transfer and does not require prior agreement from the receiving site.</p>	Guidance

<p><i>C.2.3 You must ensure that you receive a receipt from the person removing the radioactive substances from the authorised place.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirement 3, Article 7(3) of the SFRWD and article 29(3) of the BSSD.</p> <p>It helps to establish a Duty of Care system for both radioactive material and radioactive waste. It ensures that you receive a receipt on transfer of the radioactive substances.</p>	Reason
<p>The receipt from the person removing the radioactive substances does not have to include the transfer record. SEPA expects the receipt to contain, as a minimum, the date and time of transfer, name of the organisation removing the radioactive substances and sufficient information to identify the consignment.</p>	Guidance

<p><i>C.2.4 As soon as reasonably practicable following transfer, you must obtain written confirmation from the person that the radioactive substances have been received.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirement 3, Article 7(3) of the SFRWD and article 29(3) of the BSSD.</p> <p>It helps to establish a Duty of Care system for both radioactive material and radioactive waste. It ensures that you receive written confirmation that the radioactive substances have arrived at their destination.</p>	Reason
<p>For clarity, the date that the radioactive substance is delivered to the receiving facility may not be the same as the date upon which it accepts it. The receiving person may delay officially accepting the radioactive substance on to his premises until such time as he confirms that his requirements (e.g. Waste Acceptance Criteria) have been met.</p> <p>The confirmatory documentation for waste may consist of the completed consignment note or some other form of documentation (e.g. Certificate of Destruction). It can be in either paper or electronic form.</p> <p>The confirmatory documentation should be received by you within a reasonable time of the radioactive substances being received. If not, it is your responsibility to follow this up with the receiving person. If there is a significant delay between the delivery and acceptance, you should obtain confirmation that the radioactive substance has been delivered (e.g. completed consignment note, email) in addition to any confirmation that it has been accepted.</p>	Guidance

<p><i>C.2.5 Following transfer, you must ensure that the radioactive substances will be returned without delay to the authorised place if:</i></p> <p style="margin-left: 40px;"><i>(c) they are not in accordance with the transfer record; or</i></p> <p style="margin-left: 40px;"><i>(d) cannot be delivered for any reason.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirement 3, Article 7(3) of the SFRWD and article 29(3) of the BSSD.</p> <p>It helps to establish a Duty of Care system for both radioactive material and radioactive waste. In effect, it authorises the transfer of the radioactive substances back to you.</p>	Reason

<p>This requirement relates to situations where the radioactive substances cannot be delivered to the receiving person or where they have been delivered but subsequently a problem arises with it. You will continue to retain responsibility for the radioactive substances consignment until a receipt has been obtained from the receiving person acknowledging that he has formally accepted it.</p> <p>It is difficult to demonstrate compliance with this condition unless an event of this nature has occurred. SEPA expects you to have measures in place to respond to this type of event, many of which will be written down for other purposes (e.g. local rules), and this can be used as demonstration of compliance.</p>	Guidance
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### C.3 Transfer of radioactive waste

<p><i>C.3.1 You must not transfer radioactive waste to any person unless the transfer represents the best practicable means for the management of that type of waste.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirements 11, 15, 29 and 30, Articles 5(b) and 68(a) of the BSSD, Article 4(3)(a) of the SFRWD and the UK Policy for LLW.</p> <p>It ensures that the optimisation principle is expressly included in transfers of radioactive waste.</p>	Reason
<p>Further guidance on BPM can be obtained in the following documents available from SEPA's website:</p> <ul style="list-style-type: none"> <li>- "Satisfying the ALARA Requirement and the Role of Best Practicable Means"</li> <li>- "Review of the Application of Best Practicable Means Within a Regulatory Framework for the Management of Radioactive Waste"</li> <li>- "SEPA policy on the regulation of disposal of radioactive low level waste from nuclear sites"</li> </ul>	Guidance
<p><i>C.3.2 You must inform SEPA if you intend to transfer radioactive waste to a person to whom you have not previously sent radioactive waste by providing the information set out in the relevant section of Schedule 3 of these Standard Conditions.</i></p>	Condition
<p>This condition supports Article 5(1)(d) of the SFRWD.</p> <p>This condition provides transparency to SEPA and the public when you decide to use a new disposal route. It allows SEPA an opportunity to intervene at an early stage if there is a problem with the proposed receiving site.</p>	Reason
<p>SEPA is not required to respond to this provision of information. If SEPA does not respond, we have not approved the transfer or accepted that the transfer is optimised.</p>	Guidance

## C.4 Transfer of radioactive waste outside of the United Kingdom

<p><i>C.4.1 Except for sealed sources, you must not transfer radioactive waste to a person outside of the United Kingdom unless:</i></p> <ul style="list-style-type: none"> <li><i>(a) the transfer is carried out in accordance with an authorisation granted under the Transfrontier Shipment of Radioactive Waste Regulations;</i></li> <li><i>(b) the purposes of the transfer is treatment of the radioactive waste; and</i></li> <li><i>(c) any waste following treatment is returned in accordance with Government Policy.</i></li> </ul>	Condition
<p>This condition supports Article 4(4) of the SFRWD, the UK Low Level Waste Policy and Scotland's Higher Activity Waste Policy.</p> <p>This enabling condition authorises the transfer of all classifications of radioactive waste to facilities outside the UK for treatment and for the return of any waste in accordance with the Transfrontier Shipment of Radioactive Waste Regulations and applicable Government policy.</p>	Reason
<p>SEPA recognises that some forms of treatment may not be available in the UK. This condition enables you to make use of these treatment facilities, provided that he adheres to the requirements of the TFS Regulations.</p> <p>Applications for authorisation under the TFS Regulations should be submitted using the Standard Document 2008/312/EURATOM. This document is also used for officially recording SEPA's decision on whether to grant authorisation or consent to a shipment and transmitting to relevant parties. In the event that the radioactive waste to be transferred overseas falls under one of the excluded categories (e.g. NORM), it will require to be specified in your permit as bespoke conditions.</p> <p>It may not be necessary to return any treated radioactive waste/residues to you. It may be allowed to be kept or discharged in that country. This is a matter for the competent authorities in the receiving country to determine.</p> <p>If the waste to be transferred is ILW, it will be necessary for you to also comply with the requirements of Scotland's Higher Activity Waste Policy (HAW Policy). Further guidance on the HAW Policy can be found on the Scottish Government's website.</p>	Guidance

## C.5 Transfer of intermediate level radioactive waste to other parts of the United Kingdom

<p><i>C.5.1 You must not transfer intermediate level radioactive waste to a person in the UK outside Scotland unless:</i></p> <ul style="list-style-type: none"> <li><i>(a) the purpose of the transfer is treatment of the radioactive waste; and</i></li> <li><i>(b) any intermediate level waste remaining following treatment is returned.</i></li> </ul>	Condition
<p>This condition supports Scotland's Higher Activity Waste Policy and meets our organisational characteristics not to stifle innovation.</p> <p>It authorises the transfer of ILW to other parts of the UK provided the transfer meets the requirements that the purpose is for treatment and that the waste is returned.</p>	Reason

Further guidance on the HAW Policy can be found on the Scottish Government's website.	Guidance
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## C.6 Return of radioactive waste

<p>C.6.1 <i>You must ensure that any waste that is required to be returned by your authorisation is:</i></p> <ul style="list-style-type: none"> <li>(a) <i>returned to the authorised place; or</i></li> <li>(b) <i>in the case of low level radioactive waste, taken to another person in the United Kingdom who is legally entitled to receive and manage that waste, or</i></li> <li>(c) <i>in the case of intermediate level radioactive waste, taken to another person in Scotland who is legally entitled to receive and manage that waste.</i></li> </ul>	Condition
<p>This condition supports IAEA GSR part 3 requirement 15, Article 7(3) of the SFRWD, the UK Government Low Level Waste Policy and Scotland's Higher Activity Waste Policy.</p> <p>It provides clarity and operational flexibility regarding the places where different classifications of radioactive waste may be returned.</p>	Reason
<p>"Return" relates to both non-delivery of the consignment (e.g. closure of the receiving site) as well as return of waste following treatment elsewhere. An element of flexibility has been introduced to allow for the differences in the TFS Regulations, the HAW Policy in those circumstances where it could be more environmentally beneficial to transfer the waste to a third party closer to the place where the returned waste is starting its journey than the authorised place.</p> <p>Returning radioactive waste to an offshore installation where it will be disposed of to sea is prohibited by the London Dumping Convention.</p>	Guidance
<p>C.6.2 <i>You must ensure that before any radioactive waste is returned, the radionuclide content and activities have been determined.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirement 15, Article 7(3) of the SFRWD, the UK Government Low Level Waste Policy and Scotland's Higher Activity Waste Policy.</p> <p>It ensures that radioactive waste is characterised before returning it in order to demonstrate that no unexpected radionuclides or extra radioactivity has appeared. This is particularly important in cases where a substitute waste is being returned following treatment.</p>	Reason

<p>In cases where radioactive waste is being returned because of non-delivery to the intended receiving site, there is no need to re-characterise the waste. The information on the transfer record will be sufficient.</p> <p>Regarding the return of treated radioactive waste, you should be able to demonstrate that the treatment has not resulted in unexpected radionuclides (except those due to radioactive decay) or increased radioactivity appearing in the waste.</p> <p>This characterisation provides the baseline information to be used in all transfer documentation, and SEPA expects that you (and by extension, the treatment facility) will have appropriate methods to provide sufficient transparency, including, where practicable to do so, certification or accreditation to appropriate national or international standards.</p>	Guidance
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<p><b>C.6.3</b> <i>You must ensure that any radioactive waste returned:</i></p> <p>(a) <i>only contains the radionuclides that were present at the time of transfer from the authorised place (except for those present as a result of radioactive decay); and</i></p> <p>(b) <i>has an activity no greater than that at the time of transfer from the authorised place.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 requirement 15, Article 7(3) of the SFRWD, the UK Government Low Level Waste Policy and Scotland’s Higher Activity Waste Policy.</p> <p>It ensures that no other radionuclides or greater activity has been introduced into any treated radioactive waste being returned.</p>	Reason
<p>The radioactive waste will have been characterised by you before it was transferred. Allowance has been made for the introduction of “new” radionuclides due to radioactive decay.</p>	Guidance

## C.7 Transfer of samples

<p><b>C.7.1</b> <i>You must not transfer samples of radioactive substances unless the quantity sent is the minimum practicable necessary to carry out the planned tests.</i></p>	Condition
<p>This condition supports Article 29(3) of the BSSD.</p> <p>It specifically authorises the despatch of samples containing or contaminated by radioactive substances, provided it is the minimum practicable quantity.</p>	Reason
<p>SEPA does not define “sample” or specify any kind of limit on the volume, activity, type of radionuclide, etc. that can be transferred as a sample. Instead, it is left to you to make the case that the quantity being dispatched is the minimum necessary.</p> <p>It should also be pointed out that the “testing” referred to in the rule does not necessarily mean radioactive testing or analysis. For example, radioactively contaminated components may be sent away for mechanical testing.</p> <p>However, SEPA will not tolerate the abuse of this rule to facilitate sham disposal of a radioactive waste that would be otherwise prevented from being transferred by the authorisation.</p>	Guidance

<p><i>C.7.2 On completion of testing, any remaining samples and waste arisings may be returned to the authorised place.</i></p>	Condition
<p>This condition supports Article 29(3) of the BSSD.</p> <p>It specifically authorises the return of samples containing or contaminated by radioactive substances and any residues resulting from the testing to the authorised place. The receipt of waste in the form of samples is allowed without the need for it to be specifically authorised in your permit or registration.</p>	Reason
<p>Returning radioactive samples to an offshore installation where it will be disposed of to sea is prohibited by the London Dumping Convention.</p>	Guidance

## D. SEALED SOURCES

### D.1 Holdings of sealed source

<p><i>D.1.1 Unless your authorisation allows otherwise, you must ensure that the aggregate activity of all sealed sources that you hold, excluding any HASS, does not exceed IAEA category 3.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 Requirement 17 and Article 86(1) of the BSSD.</p> <p>We have removed the individual radionuclide limits for non-HASS to allow flexibility and not stifle innovation. It establishes a generic rather than bespoke limit.</p>	Reason
<p>SEPA does not set limits on the activities, radionuclides or numbers of non-HASS that you may hold. You must be able to calculate the A/D values for these sources and ensure that they remain below the top of IAEA Category 3.</p> <p>Further information on the IAEA categories can be found on IAEA website.</p> <p>Further information on the determination of source types can be found in the SEPA document “Guidance on the High-activity Sealed Radioactive Sources and Orphan Sources Regulations 2005” available on SEPA’s website.</p>	Guidance

### D.2 Security requirements for sealed sources

<p><i>D.2.1 You must have and implement security provisions in accordance with the current version of the document “Security Requirements for Radioactive Sources”.</i></p>	Condition
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<p>This condition supports IAEA GSR part 3 Requirement 17, the IAEA Code of Conduct of the Safety and Security of Radioactive Sources, Article 86(1) of the BSSD and the Environmental Authorisations (Scotland) Regulations 2018.</p> <p>Sealed sources in categories 1-4 will generally require higher security measures. This condition references the requirements set out in the police CTSA document. This allows security measures to adapt to changing circumstances without the need to vary permits. It also ensures that only people with legitimate reasons have knowledge of those requirements.</p>	Reason
<p>The security measures will be regulated via the Authorisation. However, because SEPA is not competent to assess security, we will consult with the police CTSA's on the adequacy of security measures at the Authorised Place. CTSA's will base security requirements on their own documentation; this documentation cannot be made freely available to the public or published electronically. The documentation will be provided by CTSA's to those who have a legitimate requirement for it in connection with their work; this includes you, SEPA inspection officers and other professionals such as architects and builders who need to know what standards need to be applied to construction of new premises or refurbishment of existing premises where it is planned to keep or use radioactive sources.</p> <p>Further guidance on security issues is available in a suite of documents published by the CPNI which can be obtained from their website.</p>	Guidance

<p><i>D.2.2 You must implement, maintain and periodically review your Security Plan for the Authorised Sealed Sources.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 Requirement 17, the IAEA Code of Conduct of the Safety and Security of Radioactive Sources and Article 86(1) of the BSSD.</p> <p>You must write down your security measures in a Security Plan. This document will help to demonstrate that the sealed sources are being held securely.</p>	Reason
<p>SEPA expects that you will draft and maintain a written security plan that describes how security measures will be implemented. A template for a generic Security Plan and further advice can be obtained from the CTSA's.</p> <p>SEPA also expects that the security plan will be regularly reviewed you and the reviews will be recorded as demonstration of compliance. In the event that a review indicates that the security measures should be upgraded or enhanced, we also expect that the identified improvements will be carried out as soon as reasonably practicable.</p> <p>CTSA's will be able to advise on the level of threat and the suitability of specific security. In addition, further guidance on security issues is available from CPNI which can be obtained from their website.</p>	Guidance

<p><i>D.2.3 In the event that there are any significant changes to your Security Plan, you must send a revised copy to the relevant police as soon as reasonably practicable.</i></p>	Condition
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<p>This condition supports IAEA GSR part 3 Requirement 17, the IAEA Code of Conduct of the Safety and Security of Radioactive Sources and Article 86(1) of the BSSD.</p> <p>You must inform the CTSA's of any significant change in your Security Plan so they can ensure the changes are appropriate and robust.</p>	Reason
<p>The CTSA's can provide further advice on significant changes and the address to send the modified Security Plan. In addition, further guidance on a wide range of security issues is available from the CPNI, and can be obtained from their website.</p>	Guidance

## E. HIGH ACTIVITY SEALED SOURCES (HASS)

### E.1 Financial provision

<p><i>E.1.1 You must ensure that you have made and maintain adequate, valid and useable financial provision for the management of each HASS including when they become waste.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 Requirement 17, Article 87(b) of the BSSD and Article 7(5) of the SFRWD.</p> <p>You are required to have in place adequate financial provision for HASS to cover the costs of disposal when they are no longer in use to ensure that HASS are not abandoned, disposed of illegally or otherwise become orphan sources.</p>	Reason
<p>Financial provision will usually be approved by SEPA when an application for a HASS permit is made. However, appropriate financial provision needs to be in place at all times that you are responsible for the HASS, not just once the HASS becomes a disused source. It is strongly recommended that you regularly review your financial provision to ensure that the amounts of money provided remains adequate for the safe management of HASS Authorised Sources when they become a disused source.</p> <p>You must inform SEPA of any proposed changes to the type of financial provision or its value as soon as reasonably practicable before the changes occurs.</p>	Guidance

### E.2 Record requirements

<p><i>E.2.1 You must make and keep a true, accurate and legible record of each HASS containing the information specified in Table 5 of Schedule 8 of the Environmental Authorisation (Scotland) Regulations.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 Requirement 17, Article 89 of the BSSD and Article 5(1)(d) of the SFRWD.</p> <p>You are required to keep the specified information in a specific format for each HASS Authorised Source so that the information can be submitted to SEPA as required and entered on the HASS inventory database.</p>	Reason

<p>The UK environment protection agencies have produced a common form, based on Annex II of the HASS Directive, to capture the required information. Information needs to be submitted in this format to enable it to be easily transferred to the HASS inventory database that has been created specifically to record the required information and fulfil the UK's requirements for keeping information on individual high-activity sources.</p> <p>An electronic version of the HASS record form (RSA10) is available on SEPA's website along with detailed guidance on what needs to be completed for each section of the form (RS-G-013 HASS Record Guidance).</p> <p>Please note that SEPA's records relating to sealed source authorisations have a security classification that restricts the manner in which they are handled. Furthermore, the requested records may also be subject to the National Security Direction.</p>	Guidance
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### E.3 HASS information and marking requirements

<p><i>E.3.1 You must ensure that each HASS is accompanied at all times by:</i></p> <p>(a) <i>written information which confirms that each HASS is identified and marked with a unique number; and</i></p> <p>(b) <i>photographs of the HASS, source container, transport packaging, device and equipment as appropriate.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 Requirement 17 and Article 91(2) of the BSSD. It ensures that you keep sufficient written information, including photographs, in order to identify the HASS as well as any associated equipment. This information will be particularly useful if the HASS is lost or stolen.</p>	Reason
<p>Photographs do not need to be of the specific source, and you must not endanger your safety by exposing yourself to unnecessary radiation doses in order to obtain photographs of unshielded sources.</p> <p>It is recommended that information about the HASS are gathered into a single file and kept securely as both a hard copy and an electronic file. This file should include information enabling the positive identification of the HASS, such as any wording on the device, size, weight, serial number and photographs.</p>	Guidance

### F. MOBILE RADIOACTIVE SOURCES

<p><i>F.1.1 When not in storage or in transit, you must ensure the Mobile Radioactive Sources are under continuous supervision by a suitably trained and experienced person.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 Requirement 17 and Articles 65(1)(d), 85(1) and 86(1) of the BSSD.</p> <p>Due to their nature, mobile radioactive substances may go to places where you do not have full control over the access arrangements. In these circumstances, it is critical that these sources are kept under continuous supervision in order to prevent unauthorised access to and potential removal, loss or theft of the sources.</p>	Reason

<p>Supervision does not necessarily mean having the source in direct sight. It is possible to use CCTV equipment to maintain appropriate supervision. In addition, if there are only a limited number of access points to the source which is out of direct sight, and these access points are manned by suitably trained individuals, this requirement will be satisfied.</p> <p>“Suitably trained” is someone who understands the consequences of the unauthorised removal, loss or theft of the source. This person also understands the local arrangements to keep the source safe, the extent of those arrangements and what to do if those arrangements have not been followed, there has been unauthorised access or removal of the source or if it has been lost or stolen.</p>	Guidance
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<p><i>F.1.2 You must inform SEPA of the following circumstances by providing the information set out in the relevant section of Schedule 3 of these Standard Conditions:</i></p> <p>(a) <i>If you change the location where Mobile Radioactive Sources are normally kept;</i></p> <p>(b) <i>If you intend to keep Mobile Radioactive Sources at a place other than where they are normally kept for a period exceeding four months;</i></p> <p>(c) <i>If you bring a Mobile Radioactive Source normally kept outside Scotland into Scotland.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 Requirement 17 and Articles 85(1) and 86(1) of the BSSD.</p> <p>An “authorised place” has not been defined for Authorisations for Mobile Radioactive Sources as it is recognised that authorised Mobile Radioactive Sources have been designed or adapted for being transported from place to place. Whilst it does not need to appear in the Authorisation, SEPA still needs to know where the authorised Mobile Radioactive Sources are normally kept, and if that location changes, in order to maintain regulatory control.</p>	Reason
<p>The initial place where the authorised Mobile Radioactive Sources will be normally kept will be established during the application determination period. Thereafter, SEPA must be informed of any changes as soon as reasonably practicably before the movement takes place.</p> <p>Normally, SEPA would seek to inspect the place where the authorised Mobile Radioactive Sources are normally kept, if that location is in Scotland. However, in cases where it is to remain at another location for four months or more, there may be a higher risk to the security of the authorised Mobile Radioactive Sources, and the security arrangements may need to be verified as being appropriate.</p> <p>In the case of Mobile Radioactive Sources which are also sealed sources, we will also contact the CTSA to alert them to the proposed change. We may carry out a joint inspection of the premises where the authorised Mobile Radioactive Sources will be kept.</p> <p>This requirement to inform SEPA does not apply to authorised Mobile Radioactive Sources that are normally kept in Scotland, including offshore parts of Scotland.</p> <p>The written confirmation should be sent to SEPA as detailed in Appendix 1 of this guidance.</p>	Guidance

## G. DISPOSAL OF RADIOACTIVE WASTE

### G.1 Generic Disposal Requirements

<p><i>G.1.1 You must not dispose of any radioactive waste that is not described in your authorisation.</i></p>	Condition
<p>This condition supports Article 65(2) of the BSSD. This is an enabling condition to give force to the authorisation. The disposal of unauthorised waste may result in an unplanned exposure of a member of the public or harm to the environment.</p>	Reason
<p>If no waste has been specified in your authorisation, and it is not covered by another standard condition (e.g. disposal with normal refuse), you are not authorised to dispose of any waste, except by transfer to another person.</p>	Guidance

<p><i>G.1.2 You must ensure that any radioactive waste you dispose of is only disposed of via the route that is specified for that waste as described in your authorisation.</i></p>	Condition
<p>This condition supports Article 65(2) of the BSSD. This is an enabling condition to give force to the authorisation. The disposal of waste via an unauthorised route may result in an unplanned exposure of a member of the public or harm to the environment.</p>	Reason
<p>No further specific guidance is provided.</p>	Guidance

<p><i>G.1.3 You must ensure that the quantity of radioactive waste you dispose of does not exceed any limits set out in your authorisation.</i></p>	Condition
<p>This condition supports Article 65(2) of the BSSD. This is an enabling condition to give force to the authorisation. Exceeding any specified limit may result in an unplanned exposure of a member of the public or harm to the environment.</p>	Reason
<p>No further specific guidance is provided.</p>	Guidance

<p><i>G.1.4 You must use the best practicable means to minimise the quantity of radionuclides that are discharged to the environment.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 Requirements 11, 15, 29 and 30, Articles 5(b), 29(3) and 68(a) of the BSSD and Article 4(3)(a) of the SFRWD.</p> <p>Where radioactive waste production cannot be avoided, BPM must be used to minimise the activity and volume of the radioactive waste generated. Waste reduction is an important step in radioactive waste management and controlling potential risk of an unplanned exposure to a member of the public or harm to the environment.</p>	Reason
<p>This is the second underpinning rule of optimisation.</p> <p>For further guidance on optimisation, please see the SEPA documents “Satisfying the ALARA requirements and the role of Best Practicable Means” and “Basic principles of radioactive waste management”, available from SEPA’s website.</p>	Guidance

<p><i>G.1.5 You must dispose of radioactive waste in a manner that minimises public exposure and impact on the environment.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 Requirements 11, 15, 29 and 30, Articles 5(b), 29(3) and 68(a) of the BSSD and Article 4(3)(a) of the SFRWD.</p> <p>It places the general BPM requirements directly on the disposal routes and radioactive waste types set out in the Authorisation. It also specifically states that the radiological effects of concern to the Authorisation are those to members of the public and to the environment.</p>	Reason
<p>For further guidance on optimisation, please see the SEPA documents “Satisfying the ALARA requirements and the role of Best Practicable Means” and “Basic principles of radioactive waste management”, available from SEPA’s website.</p>	Guidance

## G.2 Evaluation of releases

<p><i>G.2.1 You must evaluate the quantity of radionuclides discharged into the environment.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 Requirements 13 and 31 and Article 67 of the BSSD.</p> <p>You must evaluate the amount of radioactivity disposed of to the environment so that there is not an unplanned exposure of a member of the public or harm to the environment.</p>	Reason
<p>By “evaluate”, SEPA includes monitoring and calculation. The most appropriate method for evaluating will be optimised. It is up to you to decide and justify the chosen method. SEPA expects this decision to be written down and available for inspection.</p>	Guidance

### G.3 Disposal in normal refuse (dustbin disposal)

<p>G.3.1 You are authorised to dispose of solid, non-metallic radioactive waste in normal refuse provided that:</p> <p>(a) No single item has an activity exceeding 400 kBq for tritium and C-14 or 40 kBq for all other radionuclides;</p> <p>(b) The total activity in 0.1m<sup>3</sup> of normal refuse does not exceed 4 MBq for tritium and C-14 or 400 kBq for all other radionuclides;</p>	Condition
<p>This condition supports IAEA GSR part 3 Requirement 8.</p> <p>This is a replacement for the “disposal of low volumes of solid radioactive waste” exemption contained in the Radioactive Substances Exemption (Scotland) Order 2011.</p>	Reason
<p>The values presented are supported by radiological impact assessments which demonstrate that the relevant dose criteria are unlikely to be breached under all foreseeable circumstances.</p> <p>The radiological impact assessments that underpin this disposal route are based on the assumption that these wastes follow the “normal” route for disposal of conventional waste to a landfill or an incinerator, via (in many cases) a sorting, recovery or pre-treatment step and are co-disposed with substantial quantities of non-radioactive waste. The assessment is based on known common practice:</p> <ul style="list-style-type: none"> <li>• A waste producer, at the point of origin, places waste in a container such that the radioactive content is no more than the concentration limits in Standard Rule 4.5.2.</li> <li>• A batch of such wastes is dispatched to a waste management company.</li> <li>• The receiver of the waste- the waste management company- disposes of the batch to a landfill or incinerator, possibly following a sorting step.</li> <li>• The waste management company disposes of several batches of non-radioactive waste immediately prior to, and again after, the disposal of the radioactive batch.</li> </ul> <p>If this is not the case, and the waste is disposed of to a facility where dilution by co-disposal as described above is not expected to take place, then this condition does not apply.</p> <p>The 0.1m<sup>3</sup> volume is the approximate volume of a normal refuse bin.</p> <p>There are persons who receive radioactive waste (premises used for management of wastes which are not radioactive) for burial on land or incineration but who may be unaware of the presence of very low concentrations of radioactivity or trivial strength sources in the normal refuse. The principle here is that, in order to meet the relevant criterion for safety, conditions are applied to the waste producer and not to the waste disposer. Further controls are not necessary when the waste has left the premises where it arose.</p>	Guidance

## G.4 Radioactive aqueous liquid disposals - small quantities

<p><i>G.4.1 You are authorised to dispose of radioactive aqueous liquid waste to a relevant sewer, relevant river or the sea provided that:</i></p> <p><i>(a) The radionuclide concentration does not exceed 100 Bq/ml; and</i></p> <p><i>(b) The total activity disposed of in 1 year does not exceed:</i></p> <p><i>(i) 100 MBq for the sum of the following radionuclides: H-3, C-11, C-14, F-18, P-32, P-33, S-35, Ca-45, Cr-51, Fe-55, Ga-67, Sr-89, Y-90, Tc-99m, In-111, I-123, I-125, I-131, Sm-153, Tl-201; or</i></p> <p><i>(ii) 1 MBq for the sum of all other radionuclides.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 Requirement 8.</p> <p>This is a replacement for the “disposal of aqueous radioactive waste up to 100 Bq/ml to sewer” exemption contained in the Radioactive Substances Exemption (Scotland) Order 2011.</p>	Reason
<p>This condition allows you to discharge relatively small quantities of aqueous effluent to a pipeline that drains to a relevant sewer (capacity &gt; 100m<sup>3</sup> of effluent/day at the sewage works) or to a person (by tanker) who is permitted to receive such waste.</p> <p>The radiological impact assessments are based on small scale disposals in which the waste is disposed of to a sewer. Other pathways to human dose (for instance, disposal to a soakaway) are not covered by the impact assessment. Therefore, disposal routes other than to a sewer are not authorised under this condition.</p> <p>Aqueous liquid waste can include entrained solids or suspensions, provided that all practical measures have been used to attempt to remove such solid suspensions from the waste stream prior to disposal.</p>	Guidance

## G.5 Radioactive gaseous releases - small quantities

<p><i>G.5.1 You are authorised to dispose of gaseous waste provided that:</i></p> <p><i>(a) it consists only of fugitive releases from a container; and</i></p> <p><i>(b) it is dispersed from a building in such a way that it does not enter or re-enter a building.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 Requirement 8.</p> <p>This is a replacement for the “disposal of gaseous radioactive waste” exemption contained in the Radioactive Substances Exemption (Scotland) Order 2011.</p>	Reason
<p>This condition covers the situation where containers of liquids or solids are opened and the release of a small quantity of gas or vapour cannot be avoided. The condition does not apply if the gas or vapour arises because of a process (for example, deliberate heating) has been applied to the contained material. It does not cover any loss of gas or vapour after the liquid or solid has been dispensed.</p> <p>Gaseous waste streams may contain solid particulates or liquids in aerosol form. Provided that all practical measures have been used to attempt to fully remove such solid and liquid components from the gaseous waste stream, such particulates or aerosols may be treated as an integral part of the gaseous waste stream.</p>	Guidance

## H. FURTHER CONDITIONS WHERE BESPOKE LIMITS HAVE BEEN AUTHORISED

### H.1 Assessment of public exposure and the environment

<p><i>H.1.1 You must carry out and maintain an assessment of exposure of members of the public and radioactive contamination of the environment resulting from your discharges.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 Requirements 13 and 31 and Article 66 of the BSSD.</p> <p>You must carry out and maintain this assessment to ensure there is not an unauthorised exposure of a member of the public or harm to the environment.</p>	Reason
<p>Usually, you will have carried out an assessment when you applied for authorisation. SEPA expects this assessment to be maintained throughout the life of the authorisation.</p> <p>Some assessments may be generic and used to underpin other standard conditions. In these circumstances, SEPA expects you to know when this is the case, although you will not usually need to keep a copy of the generic assessment.</p>	Guidance

### H.2 Radioactive gaseous discharges outwith authorised outlets

<p><i>H.2.1 You must dispose of radioactive gaseous releases from an authorised gaseous outlet unless you can:</i></p> <p style="margin-left: 40px;"><i>(a) Demonstrate that directing the discharge to an authorised gaseous outlet is not the best practicable means; and</i></p> <p style="margin-left: 40px;"><i>(b) Ensure that you will not exceed any relevant gaseous discharge limit.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 Requirement 11 and Articles 65(2) and 68(a) of the BSSD.</p> <p>If you have specified gaseous limits and outlets in your authorisation, circumstances may arise where it may not be practical to use the authorised outlets. This condition allows those circumstances to be accommodated, subject to the discharge being BPM and within your gaseous limits.</p>	Reason
<p>SEPA expects that gaseous discharges subject to limits will be discharged via the authorised outlet(s). However, we recognise that in some situations it may not always be BPM to discharge via these outlets. You must write down the justification for not using an authorised outlet and be able to demonstrate that any gaseous emissions will not challenge any specified gaseous limit.</p> <p>For further guidance on optimisation, please see the SEPA documents “Satisfying the ALARA requirements and the role of Best Practicable Means” and “Basic principles of radioactive waste management”, available from SEPA’s website.</p>	Guidance

## I. INTRODUCTION OF RADIOACTIVE MATERIAL INTO ORGANISMS

<p><i>1.1.1 You are authorised to introduce radioactive materials into organisms that will leave the authorised place whilst containing that substance.</i></p>	Condition
<p>This is an enabling condition that compliments Standard Condition B.5.2 and allows you to introduce radioactive material into organisms that leave the authorised place if you have Section I specified in your authorisation.</p>	Reason
<p>Please note that this condition relates to radioactive material. It does not prevent you from discharging radioactive waste to the environment as this is separately authorised.</p>	Guidance

<p><i>1.1.2 You must carry out and maintain an assessment of exposure of members of the public that will result as a consequence of allowing organisms to which radioactive substances have been administered leave the authorised place.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 Requirements 13 and 32 and Article 66 of the BSSD.</p> <p>It replicates the requirement to carry out and maintain an assessment, as found under the disposal of radioactive waste, with regard to the introduction of radioactive material into organisms</p> <p>You must carry out and maintain this assessment to demonstrate that there has not been an unplanned exposure of a member of the public, harm to the environment or the generation of unnecessary radioactive waste.</p>	Reason
<p>Usually, you will have carried out an assessment when you applied for authorisation. SEPA expects this assessment to be maintained throughout the life of the authorisation.</p> <p>Some assessments may be generic and used to underpin other standard conditions. In these circumstances, SEPA expects you to know when this is the case, although you will not usually need to keep a copy of the generic assessment.</p>	Guidance

<p><i>1.1.3 You must ensure that public exposure and any impact on the environment resulting from the introduction of radioactive material into organisms is minimised.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 Requirements 13 and 32 and Articles 5(b), 29(3) and 68(a) of the BSSD.</p> <p>It ensures that the optimisation requirements associated with the disposal of radioactive waste are applied to the introduction of radioactive material into organisms.</p> <p>You must minimise the radiological impact of the introduction of radioactive material into organisms that leave the authorised place so there is not an unplanned exposure of a member of the public or harm to the environment.</p>	Reason

SEPA considers this very similar to the optimisation principle for radioactive waste. For further guidance on optimisation, please refer to the SEPA document “Satisfying the ALARA requirements and the role of Best Practicable Means”, available from SEPA’s website.	Guidance
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## J. ENVIRONMENTAL MONITORING PROGRAMME

<i>J.1.1 You must develop, implement, maintain and review an environmental monitoring programme to monitor the levels of radioactivity in the environment and food caused by your radioactive waste disposals.</i>	Condition
<p>This condition supports IAEA GSR part 3 Requirements 11, 15, 30, 31 and 32 and Article 67(1) of the BSSD.</p> <p>It requires you to establish and operate a suitable environmental monitoring programme to demonstrate that your radioactive discharges have been optimised and the radiological effects minimised.</p>	Reason
<p>This requirement is goal-setting and allows you to develop a suitable programme taking into account the types of radionuclides discharged, their activities, the scale of the discharge and its location in relation to sensitive receptors. It is not necessary for you to obtain prior approval of the programme from SEPA, but the programme will form part of the routine inspection associated with the Permit.</p> <p>It should be noted that you may take many more environmental samples and measurements in the vicinity of the authorised place than form part of this environmental monitoring programme. It is not required that all of this monitoring is included in the programme established under this condition, and SEPA accepts that the other monitoring may be undertaken for other purposes (e.g. public reassurance). Neither does SEPA expect that the programme has to be completely new. In all cases where it is sensible to do so, SEPA would expect a single set of monitoring data to satisfy multiple purposes.</p> <p>Further guidance on the planning and implementation of a routine environmental monitoring programme can be obtained in the joint guidance document “<i>Radiological Monitoring Technical Guidance Note 2: Environmental Radiological Monitoring</i>” available on SEPA’s website.</p>	Guidance

<i>J.1.2 You must take appropriate samples and conduct appropriate measurements, tests, surveys, analyses and calculation to continuously assess the effectiveness of the measures you have taken to minimise the radiological effects of your radioactive waste disposals.</i>	Condition
<p>This condition supports IAEA GSR part 3 requirement 14 and Article 67(1) of the BSSD.</p> <p>It is your responsibility to actively take samples and carry out measurements et al as necessary to demonstrate compliance with the requirements of the environmental monitoring programme. Appropriate sampling et al demonstrates that your radioactive discharges have not resulted in an unplanned exposure of a member of the public or harm to the environment.</p>	Reason

<p>You (with your RWA) should have carried out an assessment to determine what sampling, measurement, tests, surveys and calculations are needed to implement your environmental monitoring programme.</p> <p>The number, frequency and type of sample, measurement, etc. is dependent on a variety of factors including the nature of the radioactive substances being disposed of and the manner in which it is disposed. It may also be necessary to consider the non-radioactive properties of the radioactive substances being disposed of, particularly if they are hazardous.</p> <p>This information should be written down and included in the procedures relating to sampling, measurement etc. The results of all sampling, measurements etc. must be recorded and be available for inspection by SEPA.</p>	Guidance
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<p><i>J.1.3 You must inform SEPA of any intended change in the environmental monitoring programme.</i></p>	Condition
<p>This condition supports IAEA GSR part 3 Requirement 16, Article 67 of the BSSD and Article 5(1)(d) of the SFRWD.</p> <p>SEPA recognises that the environmental monitoring programme may need to change over time. This condition ensures that any changes to the programme are notified to SEPA with sufficient time for SEPA to consider the implications of the proposed changes.</p>	Reason
<p>It is difficult to demonstrate compliance with this condition unless there has been a need to amend the environmental monitoring programme. SEPA you to have measures in place to that SEPA is informed, many of which will be written down for other purposes, and this can be used as demonstration of compliance.</p> <p>The inability to obtain a data set due to unforeseen circumstances (e.g. no mussels available to sample) does <b>NOT</b> require SEPA to be informed. This requirement applies to planned changes to the environmental monitoring programme. However, if there is a planned temporary change to the programme (e.g. to cease beach monitoring at a specified beach until arrangements with the beach owner have been concluded), it still requires SEPA to be informed.</p> <p>It is also acceptable to inform SEPA via email. The information should be sent to the SEPA address specified in Appendix 1 of this guidance.</p>	Guidance

## K. CONDITIONS APPLICABLE TO OFFSHORE INSTALLATION REGISTRATIONS

<p><i>K.1.1 You are authorised to dispose of radioactive waste arising from the production of oil and gas, excluding any waste that has been sent to an offshore installation from land.</i></p>	Condition
<p>This condition supports the London Dumping Convention, OSPAR and Article 65(2) of the BSSD.</p> <p>This is an enabling condition to give force to the registration by describing the radioactive waste that can be disposed of as required by Standard Condition G.1.1.</p>	Reason

<p>The exclusion of waste that has been sent to an offshore installation from land prevents waste which had been sent to land for disposal from being sent back offshore for disposal in accordance with the Convention on the Prevention of Marine Pollution by Dumping of Wastes and Other Matter (the London Dumping Convention) and the Convention for the Protection of the Marine Environment of the North-East Atlantic (the OSPAR Convention).</p>	Guidance
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<p><i>K.1.2 The specified disposal route for radioactive waste disposals is the system you have provided for this purpose.</i></p>	Condition
<p>This condition supports Article 65(2) of the BSSD. This is an enabling condition to give force to the registration. Under Standard Condition G.1.2, the discharge system must be specified in the authorisation. This condition allows you to designate the system for offshore disposals in order to provide operational flexibility.</p>	Reason
<p>SEPA expects that you will formally identify which system(s) are used for offshore disposals of radioactive waste.</p>	Guidance

<p><i>K.1.3 You must not discharge radioactive waste at any place other than the authorised place.</i></p>	Condition
<p>This condition prevents radioactive waste accumulated in a support vessel (e.g. FPSO) from being discharged at any other location than the authorised place.</p>	Reason
<p>No further guidance is provided.</p>	Guidance

<p><i>K.1.4 If you have any reason to believe that the concentration of radium-226 in produced water has exceeded 0.1 Becquerel per gram of produced water you must inform SEPA in accordance with Schedule 3 of these Standard Conditions.</i></p>	Condition
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<p>This condition supports IAEA GSR part 3 Requirement 32, Article 29(3) of the BSSD and Article 5(1)(d) of the SFRWD.</p> <p>The generic disposal limits have been assessed based on an assumed concentration of radium-226 in the produced water. If this threshold is exceeded, SEPA will need to carry out further, more detailed assessments to ensure that the disposals at these higher concentrations do not result in an unplanned exposure of a member of the public or harm to the environment.</p>	Reason
<p>It is acceptable to inform SEPA via email. The information should be sent to the address specified in Appendix 1 of this guidance.</p>	Guidance

<p><i>K.1.5 You must not in any year discharge radioactive waste arising from decontamination or cleaning operations which the activity of any radionuclide exceeds the relevant limit set out in <b>Error! Reference source not found.</b></i></p>	Condition
<p>This condition supports IAEA GSR part 3 Requirements 12 and 14 and Article 29(3) of the BSSD.</p> <p>This is an enabling condition to give force to Table K-1.</p>	Reason
<p>The table does not contain all the radionuclides associated with NORM (e.g. U-238). However, SEPA believes the listed radionuclides are those of most concern and that other radionuclides will be in lesser concentrations and appear in general relation to the listed radionuclides. By limiting the listed radionuclides, SEPA is also controlling these other radionuclides.</p> <p>If you have evidence to suggest that this assumption is not accurate, you must contact SEPA immediately.</p>	Guidance

## **Appendix 1: SEPA Contact Details**

### Telephone

If required to inform SEPA by your authorisation, you must use SEPA's Pollution Hotline on **0800 80 70 60**.

If you are informing SEPA and are physically located outside of Scotland, you must use the telephone number **01698 839 028**.

The use of either telephone number will connect the person making the call to SEPA's Communication Centre, which is open 24 hours a day, 7 days a week. All calls are formally logged and will be forwarded within SEPA to ensure that an appropriate response can be made. It is recommended that you inform SEPA using these numbers, even during the working day, since there is no guarantee that the SEPA officer who normally deals with the authorisation in question will be available.

### Written Notifications & Confirmations

For informing SEPA or providing confirmation in writing required by your authorisation, unless specifically instructed by the SEPA officer dealing with the site or event, you must email the information to [RSNotifications@sepa.org.uk](mailto:RSNotifications@sepa.org.uk). This will ensure that the information is received and acted upon in a reasonable timescale.

### HASS Form Returns

For all submissions relating to HASS, you must use the HASS record form, available from SEPA's website. You must send the form to:

SEPA Registry  
Inverdee House  
Baxter Street  
Torry  
ABERDEEN  
AB11 9QA

### Data Returns

For all required data returns to SEPA (e.g. annual waste returns), you must send the required information to [RSNotifications@sepa.org.uk](mailto:RSNotifications@sepa.org.uk). This will ensure that the return is logged and passed to the appropriate SEPA officer(s) for dealing with that return.