

SD:SPUR Information Paper on the UK Regulatory Framework for the Management of Decommissioning Wastes

1. Objective

It has been agreed that an information paper will be produced for the SD:SPUR learning network on the UK regulatory framework for the management, including disposal, of solid radioactive and non-radioactive wastes that arise during site decommissioning. The paper will be written by independent consultant Marion Hill (author of the regulatory framework paper for SAFEGROUNDS). It will be placed on the SD:SPUR website, as a free download.

2. Scope

The paper will focus on nuclear and defence sites because these are of most interest to SD:SPUR. Other sites will also be mentioned because the regulators' regimes for these are the basis for MoD's self-regulation of the management of radioactive wastes on defence sites and because the regimes for other sites apply after nuclear sites are delicensed and defence sites are sold. In addition, covering other sites will make the paper a more useful reference for the revised SAFEGROUNDS guidance, which is expected to be extended to all sites on which there may be radioactively contaminated land.

The paper will include the UK-wide and Great Britain-wide regulatory regimes and those that are specific to England, Scotland, Wales and Northern Ireland. All the primary and secondary legislation will be referenced, together with government policy statements, statutory and non-statutory guidance from government departments and the devolved administrations, and regulatory guidance. There will also be references to other useful publications and tools that are readily available.

It is proposed that, subject to the agreement of the SD:SPUR Project Steering Group (PSG), the paper will cover the regulatory frameworks for:

- i) the management of solid low level radioactive wastes (LLW), including the issue of what can be regarded as radiologically 'clean', and issues in the interpretation of the Radioactive Substances Act and its Exemption Orders;
- ii) the management of solid non-radioactive wastes, particularly the practical application of the 'waste hierarchy';
- iii) interfaces between the regimes for LLW and non-radioactive wastes, including the management of 'mixed wastes';
- iv) decommissioning of nuclear-licensed sites, including the re-use of assets such as buildings and plant;
- v) decommissioning of other nuclear and non-nuclear sites and facilities where radioactive wastes may arise (eg non-licensed defence nuclear sites, nuclear-powered submarines, off-shore oil rigs);
- vi) transport of radioactive and hazardous wastes.

There will also be a short section on possible future developments in the regulatory frameworks.

As described in the current workplan, the paper will take on board the outcomes of parallel activities being undertaken to clarify areas (which arose from site visits) of potential uncertainty and inconsistency in the interpretation, application or understanding of the regulations.

3. Methodology

The first task will be to produce the outline contents for the paper. The proposed contents will be in the form of headings for sections, sub-sections and tables, with bullet points about what they will contain. The outline contents will be submitted to the PSG for comment and agreement. The outline contents will be placed on the SD:SPUR website, with a log of PSG comments and CIRIA's responses to these comments.

A full draft of the paper will then be prepared. This will be sent to regulators (the environment agencies and HSE), government departments and the devolved administrations with a request for comments on its accuracy. A log of comments and responses will be made, for use in the event of subsequent questions. The paper will be finalised in the light of the comments and taking into account any regulatory or policy developments that may have occurred since the draft was prepared.

4. Timetable

A number of policy and regulatory developments are expected towards the end of 2006 or early in 2007. These include the announcement of a new UK policy on the management of LLW, the publication of a revised version of HSE's safety assessment principles for nuclear plants (SAPs) and the issue of a second version of the Environment Agency's radioactive substances regulation environmental principles (REPs). For this reason, it is appropriate not to finalise the paper until 2007. Working back from this gives the following timetable.

<i>Task No.</i>	<i>Task & Activity</i>	<i>Time Period</i>
1	Outline contents	
	a) prepare outline contents	October/November 2006
	b) log PSG comments	November/December 2006
2	Full draft	
	a) prepare full draft	January 2007
	b) log comments from regulators etc	February 2007
3	Final paper	Post March 2007*

*subject to confirmation of SD:SPUR funding for FY2007-08