

Radioactive Waste Adviser Approval Board

Note of meeting

18 November 2024

Present: Board Member (SEPA) chair for this meeting, Secretariat (SEPA) note taker for this meeting, Board Member (EA), Secretariat (EA), Secretariat (NRW), Board Member/Secretariat (NIEA), Nuclear Board Members (NILG), Non-Nuclear Board Member (SULG), Non-Nuclear Board Member (SNNILG).

Apologies: Board Member (NRW)

1. Welcome and introductions

Board Member (SEPA) welcomed everyone to the meeting and noted that we were quorate.

2. Review of constitution

The board confirmed that they were generally content with the constitution noting the numbering issue with para 11.3.

Action 18.1: Secretariat (SEPA) to renumber the constitution prior to the next meeting.

3. Minutes of last meeting and actions arising

Minutes of the meeting held on 20 May 2024 were reviewed and agreed.

Currently meeting minutes are published in redacted form on SEPA's website. However, SEPA is making changes to its arrangements for publishing documents on its website to reflect accessibility requirements.

Action 18.2: Secretariat (SEPA) to ascertain SEPA's current document accessibility requirements for publishing on its website and the impact on publishing of the RWA Approval Board minutes.

It was noted that the minutes could potentially be published on NIEA or NRW's website. In addition, the potential for the minutes to be published on the website of other organisations, e.g. SRP, Nuclear Institute could be explored. Board Member (SEPA) expressed the preference for the minutes to be published on the website of one of the regulatory bodies.

The actions were reviewed as below:

Action 17.1 Secretariat (EA) to circulate the latest statistics from RPA2000.

Status - Complete

Action 17.2 Secretariat (EA) to ask RPA2000 for clarification and further information including:

- the number of applications where the assessors needed to ask for more information.
- whether there is any learning from this that could improve the information that RPA2000 provides to applicants.
- whether there were any particular aspects of the syllabus where applicants struggled to provide suitable evidence.

Status - Complete

Action 17.3 Circulate revised wording of 13c in the RWA syllabus to NILG, SULG and SNNILG before amending. Secretariate (SEPA) to send revised wording to NILG and SNNILG.

Status – Open

Action 17.4 Secretariat (SEPA) to contact the original enquirer and explain that the board had no immediate plans to pursue the addition of RWAs to the register of regulated professions but would keep the situation under review.

Status - Complete

Action 17.5 Secretariat (EA) to raise issue of providing more information about RWAs including contact details with RPA2000.

Status - Complete

Action 17.6 Secretariat to add issues with compiling portfolios in the medical sector to the agenda for the next board meeting.

Status - Complete

Action 17.7 Secretariat to find a suitable date for the next meeting.

Status – Complete

Action 18.1 Secretariat (SEPA) to renumber the constitution prior to the next meeting.

Status – Open

Action 18.2 Secretariat (SEPA) to ascertain SEPA's current document accessibility requirements for publishing on its website and the impact on publishing of the RWA Approval Board minutes.

Status – Open

Action 18.3 Secretariat (EA) to advise RPA2000 of the planned revised wording of 13c in the RWA syllabus

Status – Open

Action 18.4 Secretariat (EA) to advise lead regulator for Springfields Fuels Ltd to progress their assessment of the proposed changes to the Corporate RWA group and advise the RWA Approval Board of the outcome.

Status – Open

Action 18.5 RWA Approval Board to determine if it is content with the proposed revised Springfields Fuels Ltd Corporate Arrangements.

Status – Open

Action 18.6 Secretariat (SEPA) to draft letter to RPA2000 on renewal portfolio evidence and circulate to board members by mid-December 2024.

Status – Open

Action 18.7 Secretariat (SEPA) to draft letter to RPA2000 on demonstration of underpinning evidence and circulate to board members by mid-December 2024.

Status – Open

Action 18.8 Secretariat (EA) to contact the RRS� regulator and request plan for going forward and timescale for assessing the Corporate RWA arrangements

Status – Open

Action 18.9 Secretariat to find a suitable date for the next meeting

Status – Open

In relation to action 17.2, Secretariat (EA) advised:

- More information was required by the assessor for 2 applications.
- The main area of learning is applicants failing to redact confidential information. There may be improvements made to guidance to help address this.
- There were no particular aspects of the syllabus where applicants struggled to provide suitable evidence.

In relation to action 17.3, it was noted that RPA2000 should be advised of the planned revised wording of 13c in the RWA syllabus.

ACTION: 18.3: Secretariat (EA) to advise RPA2000 of the planned revised wording of 13c in the RWA syllabus.

In relation to Action 17.5, Secretariat (EA) advised that RPA2000 were of the view that providing more information about RWAs did not fit well with their role as an assessing body.

4. Changes to corporate RWA group at Springfield Fuels Limited (SFL)

Letter TOEA 187-24 from Springfields Fuels Limited was viewed.

Secretariat (EA) advised that she had spoken to the lead regulator for the Springfields site and they are both of the view that the proposed changes to the Corporate RWA group at SFL could have a significant impact on the approved Corporate arrangements (as per para 13.2 Environment Agencies Guidance for RWA). They are both of the view that more details are required on the proposed revised arrangements and how they will meet the requirements.

It was proposed that the lead regulator should ask SFL to submit its arrangements and the regulator will then undertake a proportionate assessment of the arrangements, focussing on areas of change. Following feedback from the regulator's assessment, the board can determine if it is content with the revised arrangements.

The board advised that clarification on the proposed changes was required to allow the board to make an informed decision and agreed to the proposed way forward.

ACTION 18.4: Secretariat (EA) to advise lead regulator for Springfields Fuels Ltd to progress their assessment of the proposed changes to the Corporate RWA group and advise the RWA Approval Board of the outcome.

ACTION 18.5: RWA Approval Board to determine if it is content with the proposed revised Springfields Fuels Ltd Corporate Arrangements

5. Compiling portfolios

Non-Nuclear Board Member (SULG) advised that for the medical sector some RWAs find gathering valid evidence for their RWA renewal portfolio submission to RPA2000 quite demanding. The causes of this include:

- For many RPAs, the RWA aspect of their role is smaller than the RPA aspect, hence they can claim less time providing advice on RWA aspects
- In general, there is less change associated with RWA aspects than with RPA aspects
- Course providers provide less hours on RWA aspects

Non-Nuclear Board Member (SULG) proposed that the board gives consideration to reducing the number of points required for RWA recertification, to make it commensurate with the roles.

During the discussion the following was noted:

- Although this issue needs to be looked at for the medical sector, it may be an issue for other sectors in addition to the medical sector.
- The approach taken will need to be consistent and fair and if a different approach is adopted for the medical sector, there may be a need to consider if restrictions in switching sectors are required.
- It is easier to gather the evidence to gain accreditation than to gather the evidence for renewal, as the evidence for gaining accreditation is more generic. As individuals develop into more specialist roles, they spend less time on generic areas.
- There appears to be inconsistencies in the points allocation versus time spent for activities
- Whilst there is a clear position regarding the extension in place for maternity leave, the position regarding those holding a part-time position is less clear. This may need further consideration.

It was agreed that the first stage of addressing this issue should be the Board writing to RPA2000 advising of:

- The feedback from the medical sector that it is less problematic to gather the evidence for gaining accreditation than to gather the evidence for recertification and ask RPA2000 to review the recertification process in light of this feedback.
- The Board is of the view that it may be worthwhile for RPA2000 to approach other sectors to establish if this is a common issue.
- The Board suggests RPA2000 reviews the 'Instructions for the Renewal of RWA Certification: The Renewal of RWA Certification Scheme', dated July 2016.
- The Board suggests RPA2000 reviews the balance between amount of points allocated versus time spent on activities.

ACTION 18.6: Secretariat (SEPA) to draft letter to RPA2000 on renewal portfolio evidence and circulate to board members by mid December 2024.

Secretariat (EA) advised that RPA2000 is currently exploring the option of online systems for assessment and renewal submissions.

6. RPA demonstration of underpinning knowledge

Follow up to action 16.7 from November 2023 RWA Approval Board.

Following HSE's change to its statement on RPAs, regarding the use of membership of professional societies to demonstrate competency, the Board had agreed that RPA2000 should no longer apply reciprocal arrangements for recognition of RWAs based on existing RPA certification unless accreditation was obtained prior to January 2022. Board Member (SEPA) subsequently wrote to RPA2000 advising of the Board's position.

The response received from RPA2000 was viewed. In its response RPA2000 proposed accepting as evidence for GA and BU topics, a MPE certificate, pre-2022 RPA certificate, successful

completion of the Strathclyde course and other training courses which can demonstrate the topics are covered at sufficient level.

During the discussion the following was noted:

- The previous Secretariat (SEPA) had produced a paper that had compared the ways of certification and criteria for membership of societies.
- For GA and BU, we would consider it would be the role of RPA2000 to assess courses, and not the role of the RWA Approval Board
- Although CRadP is mentioned in paragraph 3, it is not included in the list of acceptable evidence proposed in paragraph 4
- The RWA Board assume RPA2000 are assessing and reviewing these schemes and courses to assure themselves that they meet the necessary requirements
- The original letter from the Board to RPA2000 only related to grandfather rights going forward and the reciprocal arrangements no longer applying. The response from RPA2000 covered other aspects.

ACTION 18.7: Secretariat (SEPA) to draft letter to RPA2000 on demonstration of underpinning evidence and circulate to board members by mid December 2024.

7. AOB

Secretariat (SEPA) advised that subsequent to Dounreay joining with Magnox Limited in 2023, Magnox Limited has changed its name to Nuclear Restoration Services Limited.

Secretariat (SEPA) advised that the application received from Rolls Royce Submarines Limited (RRSL) in October 2022 for its Corporate RWA arrangements is still open. Secretariat (EA) advised that she had spoken to the lead regulator who is making the assessment. The assessment has not been completed due to time and resource constraints and the regulator has advised they will try to obtain more resources for this.

Action 18.8: Secretariat (EA) to contact the RRSL regulator and request plan for going forward and timescale for assessing the Corporate RWA arrangements

8. Next meeting

To be chaired by NRW.

Action 18.9: Secretariat to find a suitable date for the next meeting.

Meeting closed.

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