

Radioactive Waste Adviser Approval Board

Note of meeting

20 May 2024

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

Apologies: Board Member (NRW)

1. Welcome and introductions

Board Member (EA) 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.

On confidentiality, board member from NILG noted that there might be some issues that were subject to confidentiality that it might be helpful to include in the meeting notes, but these would be withheld from the redacted minutes published on SEPA's website. The board agreed.

3. Minutes of last meeting and actions arising

Minutes of the meeting held in November 2023 had been agreed by correspondence and published in redacted form on the SEPA website. The chair asked for any further comments, but none were noted.

The actions were reviewed as below:

Action 14.1 Secretariat (SEPA) to draft some text by the end of October for circulation to approval board members for their consideration. Secretariat (SEPA) forwarded a revised RWA Statement after the last meeting (email sent 11/3/22) but the revised statement has not been published yet. Secretariat (SEPA) to arrange for publication on website.

Status – Complete

Action 16.1 Secretariat (EA) to contact RPA2000 to query the length and reason(s) for delays in application and renewal processing times.

Status – Complete

Action 16.2 SEPA to publish the agreed, name-redacted minutes of meetings on their webpage going forward.

Status – Complete

Action 16.3 NILG, SULG and SNNILG members to meet and agree a proposed form of wording that will work for nuclear and non-nuclear users and present it for approval to the Board.

Status – Complete

Action 16.4 The Secretariat to meet to fill in the survey on the implementation of the BSSD requirements for RPE jointly before 31st December.

Status – Complete

Action 16.5 Secretariat (SEPA) to write to Magnox confirming that RWA Board is content with proposals.

Status – Complete

Action 16.6 Board Member (SEPA) to write to EDF to raise the RWA Board's concerns about the impact on their Corporate RWA arrangements due to the reduction in EDF sites and available staff as a result of the transfer of AGR sites to Magnox.

Status – Complete

Action 16.7 Board Member (SEPA) to write to RPA2000 confirming the Secretariat's interim advice is now confirmed as permanent advice i.e. that they should no longer apply reciprocal

arrangements for recognition of RWAs based on existing RPA certification unless that accreditation was obtained prior to January 2022.

Status – Complete

Action 16.8 Board Member/Secretariat (NIEA) to request that RWAs are added to the Register of Regulated Professions and Secretariat (SEPA) to respond to the enquirer.

Status – Complete

Action 16.9 Secretariat to find a suitable date for the next meeting.

Status – Complete

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

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.

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

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.

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

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

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

4. RWA statistics

RPA2000 had responded to the board's query about delays processing of applications for RWA recognition. RPA2000 explained that they aim to complete assessments within 3 months (91 days) of receipt of portfolios but, in any case, within 6 months (182 days). This excludes any time waiting for additional evidence/information that may be required from the applicant; in this situation the assessment "clock" is paused.

RPA2000 explained that the statistics submitted previously had erroneously included the time spent writing for additional information.

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

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 provide to applicants.
- whether there were any particular aspects of the syllabus where applicants struggled to provide suitable evidence.

5. Review of syllabus

NILG, SULG and SNNILG representatives reported on their proposed wording for section 13c of the RWA syllabus to adequately capture waste consignment and Waste Acceptance Criteria competency, that will work for nuclear and non-nuclear users. This issue originally arose from an Environment Agency task and finish group report in response to mis-consignment events in the nuclear sector including two to LLWR.

The board were satisfied with the proposed form of words “Understanding of the environmental and practical impact of radioactive waste disposals along the full disposal route (including relevant Waste Acceptance Criteria or exemptions/General Binding Rules conditions)” as a replacement for the current wording of 13c.

Action 17.3: circulate revised wording of 13c in the RWA syllabus to NILG, SULG and SNNILG before amending.

6. Register of regulated professions

Follow up to action 16.8 from November 2023 RWA Approval Board.

The Board had previously agreed that it would be appropriate to add Radioactive Waste Adviser to the register of regulated professions.

Board Member/Secretariat (NIEA) had contacted the department for Business and Trade (DBT), who are responsible for the register, for further information. In order to add a profession to the register

- The board would need contact the responsible government department who would then need to formally request that the DBT add the profession to the register.
- The board would also need to comply with legal requirements to offer routes to recognition for professionals from other countries.

To add the RWA to the register of regulated professions would require considerable input of resources from the RWA Approval Board secretariat and was not considered to be a priority as there had only been one enquiry. The board agreed that this would be kept under review.

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.

7. RWA list details

Secretariat (EA) had a query from operational colleagues on details contained within the list of current RWAs on RPA2000's website. RPA2000 provide a list of individual RWAs but this only includes names and the expiry date of their certificate. Some permit holders find it difficult to identify suitable RWAs from this and would find more information, including contact details or employer helpful, where the RWA is happy to provide them.

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

8. AOB

Non-Nuclear Board Member (SULG) explained that some RWAs find gathering evidence for their RWA renewal portfolio submission to RPA2000 quite demanding. Non-Nuclear Board Member (SNNILG) confirmed that this can be an issue in the medical sector.

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

9. Next meeting

To be chaired by SEPA.

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

Meeting closed.

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