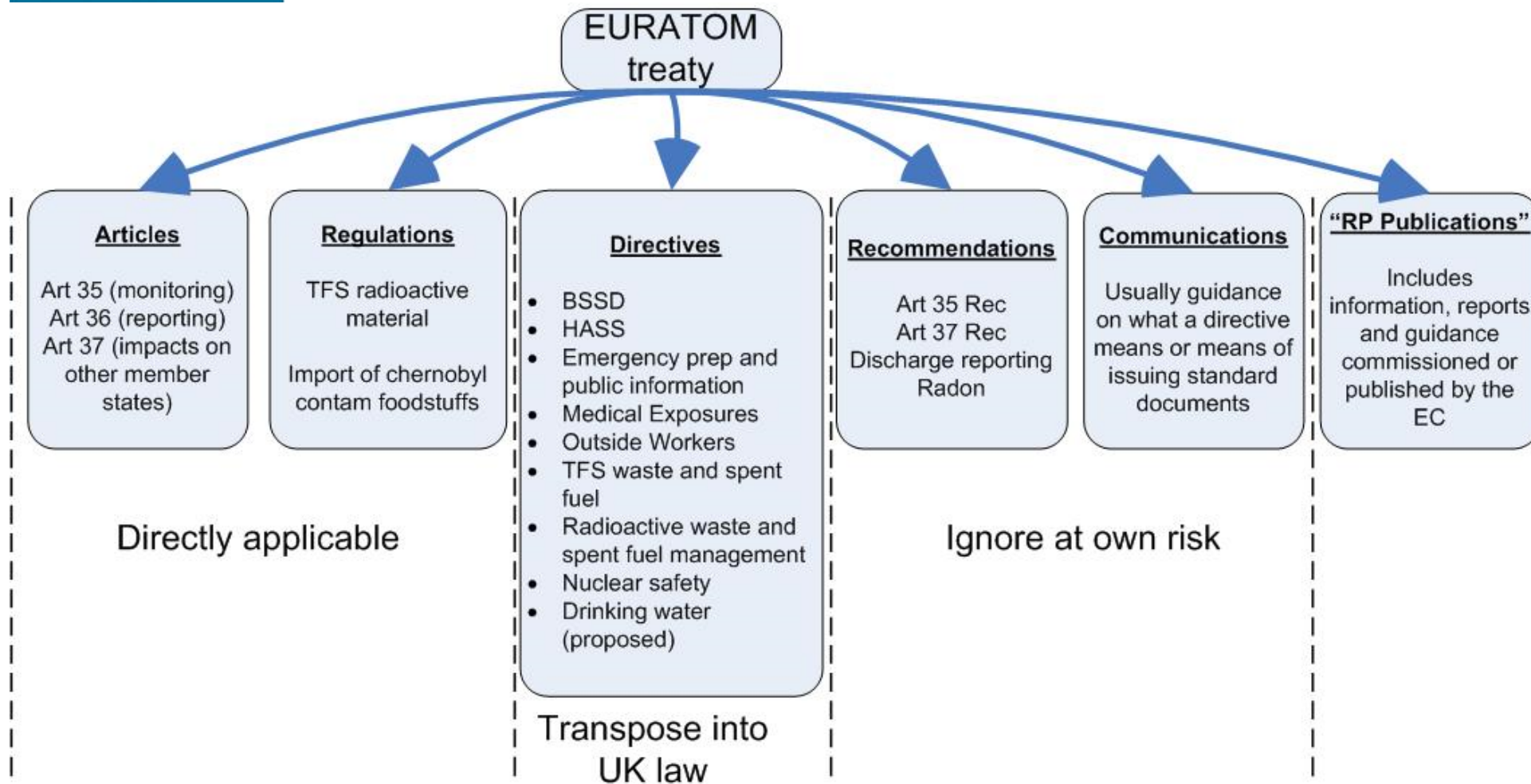


Reforming Radioactive Substances Regulation in Scotland

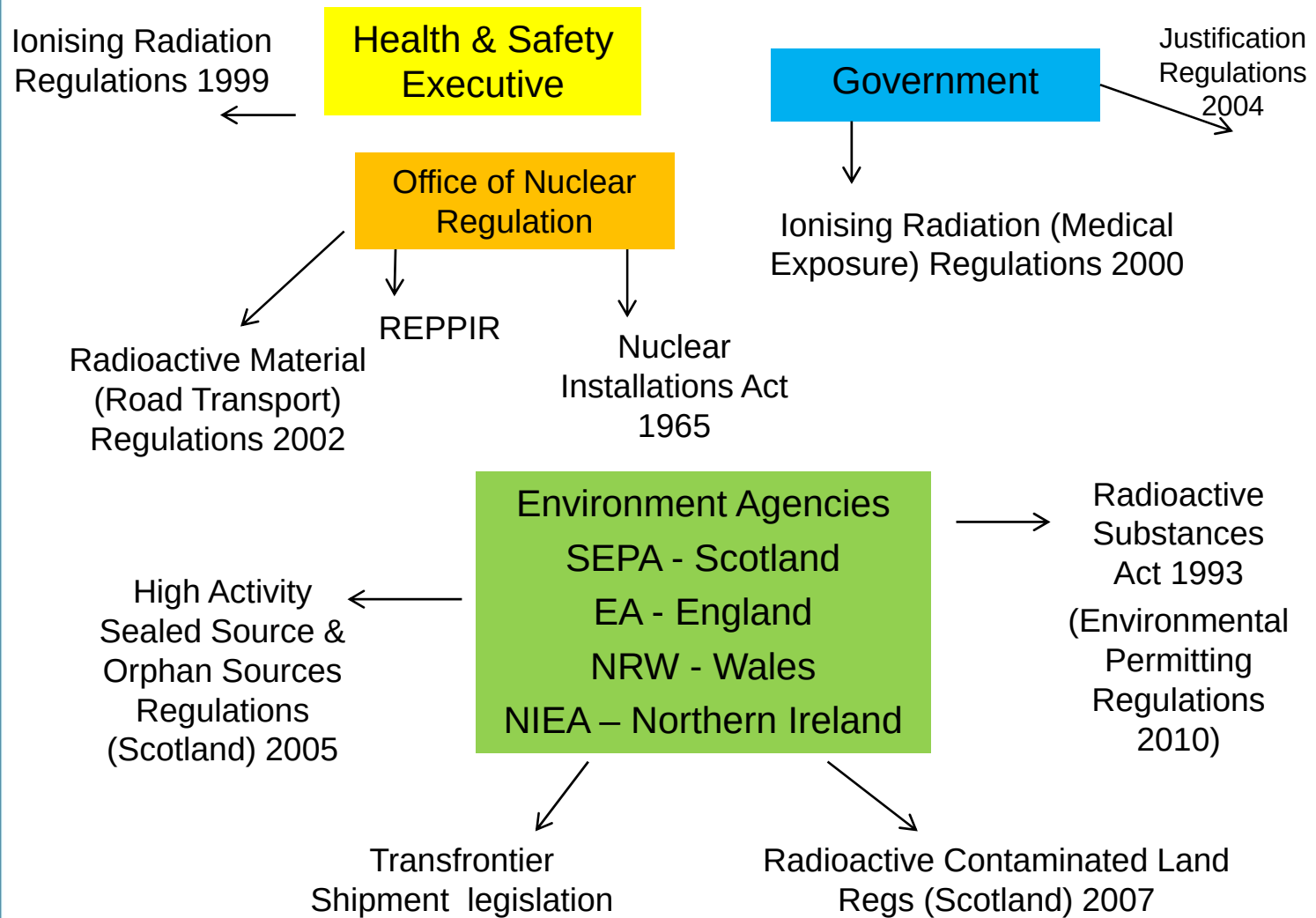
Isabelle Watson
ERPAN 2016

Radioactive Substances Regulation in Scotland

- Current status
- Regulatory Reform Act 2014
- Proposed RS Regulations
- Regulating hospitals



The UK System



Currently

Radioactive Substances Act 1993 in Scotland & Northern Ireland

- Defines radioactive material and waste
- Prior approval and permitting system
- Aims to control the radioactive substances by placing controls on the keeping and use of radioactive material and the accumulation and disposal of radioactive waste
- Permits defined people and premises
- Include High Activity Sealed Source requirements
- Defined enforcement measures
- Out of Scope and Exemptions



Regulatory Reform
(Scotland) Act 2014

2014 asp 3

Explanatory Notes have been produced to assist in the
understanding of this Act and are available separately

815 30

Regulatory Reform (Scotland) Act

- Received Royal Assent on 19 February 2014
- Gives SEPA a new Statutory Purpose
- Gives SEPA new enforcement measures
- Introduces a new offence of “significant environmental harm”
- Gives the Courts new powers
- An enabling Act that allows Scottish Ministers to make further regulations



New Regulations

- Aim to have a common framework for the four main regulatory regimes:
 - Radioactive Substances
 - Air/PPC
 - Waste
 - Water
- Common administrative regulations
- Separate media-specific technical regulations

Future Changes - Regulatory Reform

Administrative
arrangements



Act

Common
Framework

RS

Waste

PPC

CAR

Regs

Describes what is regulated and any
specific requirements



Proposed RS Regulations

- Will implement BSSD requirements
- Simplification of exemption order regime
- Ability to include an offsite condition
- Removal of requirement to display certificates
- Formalisation of regulation on nuclear sites
- Inclusion of a surrender test for all sites
- Removal of Crown Immunity
- Regulated activities



RS Regulated Activities

- **Production of radioactive material**
 - via the creation of radionuclides other than in a nuclear reactor or as a result of radioactive decay
- **Keeping and use of radioactive materials**
 - where keeping and use includes receipt, lending, letting on hire, transfer to another person, introduction into the environment and introduction into organisms.
- **Management of radioactive waste**
 - where management includes the storage, treatment and disposal of radioactive waste.
- **Receipt of radioactive waste from another person or premises**
- **Transfer of radioactive waste to another person or premises**

Tiers of Authorisation

- General Binding Rules (GBRs)
- Notification
- Registration
- Permit

Features of the Tiers of Authorisation

Tier	Env Risk	Conditions	Ability to Refuse	Public Consult	Level of Assessment	Inspection Frequency	Revocation	Expiry
Permit	Higher	Standard Rules & Bespoke	Yes	Flexible	Complex	Routine (higher)	Any reason	Flexible/ Surrender
Registration				No	Simple	Routine (lower)		
Notification	Lower	Standard Rules	No		None	None	Yes	
GBR						None	No	No

Regulation of Radioactive Substances in Hospitals

Currently hospital specific :

- Registrations for keeping and use material
 - Open sources for administration to patients
 - Open sources for other purposes eg research
 - Closed sources
 - Mobile apparatus
- Authorisation for accumulation and disposal of waste
 - Waste excreted from patients
 - Any other wastes

Regulation of Radioactive Substances in Hospitals

- Issues
 - administrative
 - specific to premises
 - flexibility
 - out patients
- Possible solutions
 - combined certificates
 - corporate permits
 - further focus at the hospital

Planned timescale

Later 2016 and/or early 2017– Consultation on:

- Draft administrative regulations
- High level transitional arrangements
- Proposals for technical regulations
- Draft technical regulations
- Detailed transitional arrangements
- SEPA guidance

September 2017 – Lay Regulations

January 2018 – Regulations come into force

Thank you for listening