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The UK Code of Practice on Clearance and Exemption

What is the Code of Practice

- Principles, Processes and Practices for Clearance and Exemption of material and waste
- Produced by the Clearance and Exemption Working Group (CEWG)
- CEWG is a sub group of the Safety Directors Forum (SDF)
- Nuclear Industry in the UK has long established history of collaborative and peer group working

Legislative Background

- Radioactive Substances Act and more than 20 specific exemption orders
- Developed over time
- Radiological protection basis not consistent
 - e.g. 0.4 Bq / g (sum of all radionuclides)
- Complex and not well understood by frontline practitioners - open to interpretation
- As a consequence practices and standards varied

Previous Guidance

- Industry had previously established guidance – the HASPEM Paper
- Specified surface clearance levels
- Link back to legislation not as clear or transparent as it could be
- Reflected common contamination control practice rather than strict regulatory requirements
- Dated and in need of review and challenge

The Challenge

- Update the Guidance in line with current legislation
- Range of business and operational backgrounds
- Long established practices and culture needed to be change
- Regulatory and Stakeholder “buy in” essential
- Credibility and corporate reputations at risk

The Process

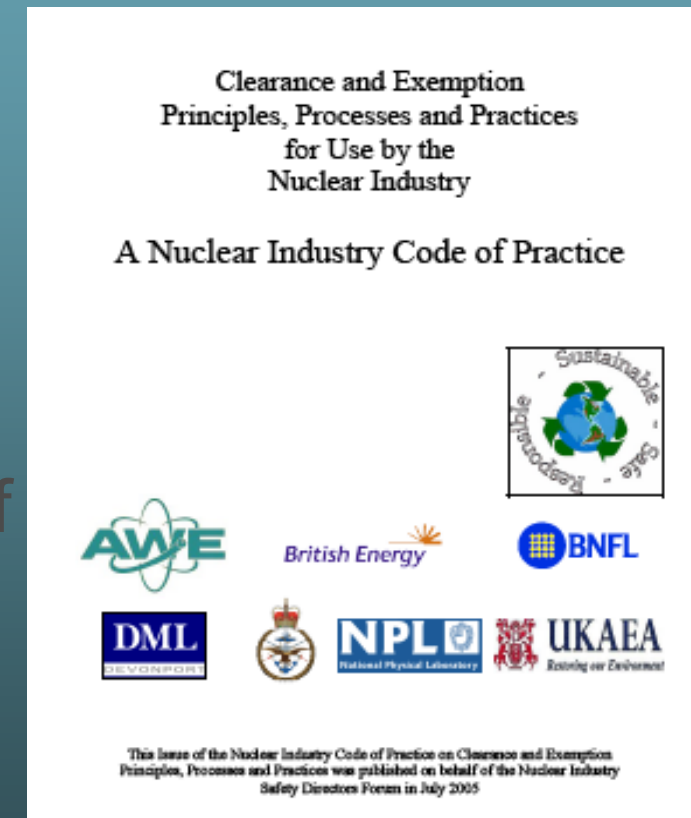
- Representatives from across UK industry – recognised experts
- Many meetings and long discussions, debates, arguments.....
- All too difficult – easy to get bogged down in the specifics
- A painful development process
- The challenge was to do the right thing!

Engagement

- Consulted the regulators and NRPB / HPA and asked for comments on draft document
- Looked to metal recycling and waste management industry and for views
- Discussed with representatives of concern groups – invited to present at Workshops
- Presented approach to NuLeAF

The Results

- Eventually produced the:
 - Clearance and Exemption Principles, Processes and Practice for use by the nuclear Industry
 - A Nuclear Industry Code of Practice (CoP)
- Endorsed by the UK Safety Directors Forum



www.cewg.safety-directors-forum.org

What Is The CoP's Standing

- Regulators content that the CoP meets the intent of the law
- Expect industry to be using the CoP as standard
- EA and SEPA now attend CEWG meetings
- CEWG keeping CoP under continuous review

Is There Still a Need?

- Need for clear standards and guidance remains – practices need to be embedded
- Arguably more important than ever
- Project driven nature of decommissioning means mobile workforce and contractors
- Harmonised approach is of benefit to all
 - Operators - expectations clear
 - Contractors - process / practices consistent
 - Regulators - consistent standards

Future Developments

- UK legislative developments – DEFRA / DECC EO Review
- Likely to introduce radionuclide specific exemption levels
- To include liquids and gases
- Risk based approach
- A welcome development – but not without its challenges

Implications for the CoP

- Will need to be revised – CEWG already planning for this
- However - CoP framework robust against changes in numbers
- It's the principles and philosophies that matter
- Framework and approach applicable to other waste types

Example Waste Stream



71,000
tonnes of
Magnox boilers

Each boiler weighs
between
310 and 885 tonnes

Summary

- Industry led success
- Good demonstration of working with the regulators for mutual benefit
- Still work to be done
- Need to maintain standards
- EO review provides a significant opportunity
- Need to work together