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 consequences 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