

**Scottish Environment Protection Agency
Report to the Chapelcross Stakeholders' Group
June 2016**

Radioactive Substances Act 1993

Variation

SEPA has issued the Chapelcross site with a notice of variation to their extant Authorisation. This variation gives an increase in the site's annual sub-limits for gaseous tritium discharges from a number of specified outlets; namely those discharging at a height greater than 5 meters above ground level and those discharging at a height less than 5 meters above ground level. These outlets do not include the Chapelcross Processing Plant.

The increases associated will not add to the site's over-all limit for the discharge of gaseous tritium. As such there will be no additional environmental burden with and no increase to the level of radiological exposure to any member of the public.

In varying the site's annual sub-limits for the outlets discharging at a height greater than 5 meters above ground level, SEPA has included a requirement for the site to inform SEPA if the discharges exceed a specified Monthly Notification Level. This level equates to just under one twelfth of the pre-variation annual sub-limit. Were this to be exceeded the site would have to provide to SEPA a written submission detailing the occurrence and the means they are using to minimize the activity of the gaseous tritium discharged as well as a review of the Best Practicable Means associated with the management of the discharges.

In addition SEPA has taken the opportunity provided by the site's application for a variation to introduce a number of additional conditions to the Authorisation. The first of these, which relates to the remediation of contamination resulting from any unauthorized releases of radioactive substances, is a standard condition which is being introduced at all authorised nuclear sites across Scotland.

SEPA has also introduced a specified improvement, with an associated completion date, to the site's Authorisation. This requires the site to provide to SEPA, within six months of the implementation of the variation, a programme for the substantial and progressive reduction of gaseous discharges from the Chapelcross Processing Plant. This programme is to be implemented with two months of its submission to SEPA.

Warning Letter

SEPA has issued the Chapelcross works with a warning letter under the Radioactive Substances Act 1993 (as amended). This warning letter relates to circumstances surrounding the site's notification to SEPA on 26 February 2016 that a quantity of small bore pipework which constitutes Low Level Radioactive Waste (LLW) under the Radioactive Substances Act 1993 (as amended) was disposed from the site as Out of Scope waste. This is contrary to Condition 7.1.1 of the site's Authorisation which states that *'the Authorisation Holder is only authorised to dispose of LLW only to a*

waste permitted person and only where this is the best practicable means for the disposal of that type of waste’.

SEPA would stress that there are no radiological impacts on the public or the environment associated with the improper disposal of this waste. Further, SEPA is aware that the very low level of radioactive contamination associated with this pipework is of the same order as would be permitted to be disposed ‘to dustbin’ under the exemption provided in the Radioactive Substances Exemption (Scotland) Order 2011.

However, the site did not comply with the conditions of the above exemption and nor did they comply with a number of conditions, within their Authorisation, associated with the management of radioactive waste arisings on the site.

SEPA intends to work closely with the site to ensure that all recommendations arising from the investigation into this incident are implemented appropriately.