

**Scottish Environment Protection Agency  
Report to the Chapelcross Stakeholders' Group  
September 2017.**

**Radioactive Substances Act 1993**

**Inspection**

SEPA has undertaken two recent inspections at the Chapelcross site.

The first inspection (March 2017) focussed on the site's procedures for the management and clearance monitoring of segregated solid waste arising from the ongoing decommissioning of the Heat Exchangers and associated infrastructure. This is an area of interest for SEPA given the practical difficulties the site has experienced with clearance monitoring in an area of high background radiation such as that associated with the Heat Exchangers.

The inspection focussed on the management procedures for the segregation and sentencing of waste that the site has implemented over the past year. These procedures are focussed on close management control and supervision of the stripping of waste by designated waste controllers. This includes the control of access to the stripping area, ensuring that only one characterised waste stream is stripped at any time and the control of access to waste skips and containers. Confirmation monitoring of samples from stripped waste is then undertaken in low background areas to give further reassurance.

SEPA found that the site's new procedures are suitable to meet the requirements of their Authorisation and that they address the practical difficulties the site has experienced with monitoring in an area of high background radiation.

The second inspection (July 2017) focused on Magnox Corporate arrangements. The aim was to determine if the site had implemented appropriately the approved Corporate Radioactive Waste Adviser arrangements (CRWA) at Chapelcross. The site's Authorisation requires that they have RWAs in post to ensure compliance with the limitations and conditions of there-in.

The inspection found that the site had implemented the Corporate arrangements adequately and had appointed appropriately trained and experienced staff to provide expert advice on all the areas required to meet the requirements of their Authorisation under RSA93.

**Variation Application**

The site applied to SEPA for a variation to their Authorisation in May 2017. The application is for an additional three nominated stacks for the discharge of gaseous radioactive waste with associated sub-limits for tritium and 'all other radionuclides' or carbon-14 to the current Authorisation. There will be no increase to the site

discharge limits and, consequently, the potential exposure group dose will not increase above that modelled previously for the most recent Authorisation in 2013.

Two of the new discharge points are associated with a proposed encapsulation plant and vacuum drying plant respectively. These are needed to support the retrieval, conditioning and packaging of intermediate level radioactive waste (ILW) on the site. The third is associated with the site's proposed interim storage facility. This is intended to store conditioned and packaged ILW on site in line with the Scottish Government Policy on Higher Activity Waste.

SEPA is currently determining the application and has consulted the Scottish Government, Food Standards Scotland and the Office for Nuclear Regulation.