

Environmental Permitting Regulations 2010/11 – Permit Matrix (Open Radioactive Substances) – ALL SITES
e.g.: EPR/TB3135DN - 13.12.2011

Department of XXXXXXXXXX – Operational Compliance with RELEVANT conditions of Permit as they apply to departments
- please refer to Permit for full list of conditions and relevant EA guidance (“How to comply...”) under further information

<http://www.safety.admin.cam.ac.uk/subjects/radiation/ionising-radiation/further-information>

Condition Number/Topic	Condition details	University evidence of compliance	Typical departmental evidence of compliance	Further comments
1 Management				
1.1 General Management	1. Activities to be in accordance with a (suitable and sufficient) written management system, using sufficient competent persons and resources	University publication – “Management of Work with Ionising Radiation in the University of Cambridge”:HSD007R (Section 2 –Organisation)	<i>Departmental Safety and RP Policies – and ‘Local Rules’</i>	ADD PAGE and SECTION REFERENCES TO GREEN COLUMN
	2. Keep records to demonstrate compliance with above.	Radiations Audit process - reports and responses - Filed in the SO.	<i>Training records, and reports received form Audit and Inspections</i>	
	3. All persons having duties under, or are affected by, the permit, to have convenient access to the permit, nearby to where the duties are carried out	This advice is given in post-Audit letters and at other opportunities. Section 3.2 of HSD007R.	<i>In safety and RP policies and Local rules</i>	
	4. University to manage and operate the activities in consultation with a suitable RPA	Two RPA/RWAs appointed in writing by University – Section 2.3 of HSD007R	<i>Department is required to consult the RPA/RWAs – In departmental Policy</i>	
2 Operations				
2.1 Permitted Activities	1. Only carry out activities specified in Schedule 1.	Sections .3.2 of HSD007R	<i>Local Rules</i>	
	2. Only use those sources specified in Schedule 1.	Section 3.2 and 3.5 of HSD007R	<i>Local Rules and Sub-Permits</i>	
	3. Maximum activity (Bq) not to exceed that specified in Schedule 1.	As 2.1.1 and 2.1.2 above	<i>Sub-Permits</i>	

2.2 The Site	1. The limit of the site to be within the marked area shown on the site plan included with the Permit.	Plan attached to back of each EPR Permit	Listed areas in Local rules –	
2.3 Operating techniques	1. Use BAT to minimise activity of ra material on the premises. Use BAT to minimise the period over which ra waste is accumulated. Use BAT to minimise the activity of radioactive waste produced on the premises for future disposal on or off the premises. Use BAT to ensure all relevant parts of the premises do not readily become contaminated and any contamination can be easily removed. Use BAT to prevent the loss of any material or waste. Use BAT to prevent access to any material or waste by any person not authorised by the University.	Section 3.3 of HSD007R HSD035R (Best Available Techniques)	Departmental BAT written procedures and as prefix to all risk assessments.	
	2. Use BAT to minimise activity of gaseous and aqueous waste disposed to the environment Use BAT to minimise the volume of ra waste transferred to other premises Use BAT to dispose of ra waste at such times and in a form and manner to minimise radiological effects to the environment and the public.	As above	As above	

2.3 Operating techniques (contd)	3 Use BAT to exclude entrained solids, gases and non-aqueous liquids from r1a aqueous waste prior to discharge. Use BAT to ensure that any gaseous ra discharge does not re-enter the building.	As above	As above	
	4. The University to maintain in good repair the systems and equipment to meet the requirements of 2.3.1, 2 and 3 above , and the systems and equipment required to carry out monitoring and measurements necessary to demonstrate compliance with this Permit.	Annual examination and test programme for monitors Inspection of laboratory facilities Annual "Testing of Monitors" guidance document (SO)	Retention and availability of test Certificates from annual examination and test programme Departmental Inspection and maintenance programs	
	5. The University to check at appropriate frequency the effectiveness of systems, equipment and procedures to meet 2.3.1, 2 and 3 above.	Audit programme and Guidance on Web-site Section 5.2 of HSD007R	Departmental Inspection and maintenance programme – keep records for inspection	
	6. Any container in which ra material or waste is stored to be clearly marked with word radioactive' and the appropriate BS symbol any other information as is necessary to the identification of the material or waste.	Section 4.9 of HSD007Rs	Local Rules	
	7. Appropriate criteria to exist for acceptance into service of systems, equipment and procedures for carrying out any monitoring and measurements necessary to demonstrate compliance with the Permit.	Section 5.1 of HSD007R and Appendix 5 and 6 of HSD010Rs	Local Rules	

2.3 Operating techniques (contd)	8. Copies of the Permit to be posted so that persons having duties under the Permit, or who may be affected by matters within the Permit can conveniently read the Permit.	.Section 3.2 (page 15) of HSD007R	<i>Local Policy Document</i>	
	9. Records for open sources to be maintained showing radionuclide present, and activity on the date received. Also as far as practicable the location of open sources on the premises. Also if sources are removed from the premises, the activity on that date and the name and address to whom the source has been transferred. . Also a record of the activity present on the premises at the end of each calendar month.	Sections 4.8 and 4.9 of HSD007R and section 6.4 and Appendix 10 of HSD 010R	<i>Departmental Local Rules - record keeping system – central log book and local stock pot records</i> <i>Excel return sent monthly to Safety Office</i>	
2.4	1 No work to take place until any pre-conditions imposed by EA are completed.	Section 3.2 of HSD007R	<i>Local/Rules</i>	
	2 Confirmation of completion of the measures to be sent to the EA within 14 days of completion	As above	<i>Local Rules</i>	
2.5	1 Any improvements required at any time by the EA to be completed by the date specified	As above	<i>As above</i>	
	2 Completion of improvements to be notified to the Environment Agency	As above	<i>As above</i>	
2.6	1 Only waste allowed by the Permit to be accepted	Departments Sub-Permits do not permit waste acceptance, High Cross Site – Local Rules HSD010R Section7	<i>No incoming waste permitted – see sub-permit.</i>	

2.6 (contd)	2 For each type of waste a written specification to be held to enable disposal in accordance with the Permit to be made.		<i>Local Rules</i>	
	3 Provide a copy of the specification to the producers of the waste	Requests for letters of agreement in principle – filed in SO	<i>NA for departments</i>	
	4 All waste received to be accompanied by a legible note containing the specified information	University transfer/consignment documents - see. HSD025R –Form IR002	<i>NA for departments</i>	
	5 A copy of the note to be kept	Stored in Safety Office	<i>NA for departments</i>	
2.7 Accumulation of radioactive waste	1. Only waste of the type as specified in Schedule 2 may be accumulated	Issue of specific sub-permits See section 7 page 11 of HSD007R	<i>Comply with sub-permits. Monthly checks by RPS</i>	
	2. The limits on accumulation in schedule 2 shall not be exceeded.	Issue of Sub-permit limits on accum/disp, Section 4.11 page 41 of HSD007R	<i>Compliance with sub permit and monthly reporting to SO</i>	
3 Disposal of radioactive waste and monitoring				
3.1 Disposals	1. Only disposals of the types, and to the routes specified in Schedule 3, to be permitted.	Section 3.3 of HSD007R and HSD010R	<i>Comply with departmental Sub-Permit and contingency plans to properly deal with unexpected waste.</i>	
	2. Limits on disposal in Schedule 3 must be observed.	As above	<i>As above</i>	
	3. Transfers of waste must be in accordance with the recipients instructions, be carried out in suitable containers, and not subject to delays before acceptance at the recipients premises.	HSD010R Section 7	<i>Package label and document in accordance with departmental local rules</i>	
	4. Supply written information to recipient of waste as to radionuclides and activity	As above	<i>Local Rules - Departments to complete and sign transfer note and supply to person collecting waste</i>	
	5. Any waste not properly packaged in accordance with Permit to be repackaged and returned to originator	Page 13 of HSD010R	<i>Departmental local rules define packaging standards</i>	

3.1 (contd)	6. Records of all disposals of radioactive waste shall be compiled not later than 14 days after the end of each month.	Section 5.2 of HSD007R	<i>Supply to the SO excel spread-sheet within the 14 days of end of month.</i>	
3.2 Monitoring	1 If required by the EA, take, and analyse samples or carry out surveys or measurements. Keep samples relating to the above or despatch to testing to an appropriate laboratory, and subsequently arrange for appropriate retrieval of the samples.	Section 2.2 of HSD007R	<i>Ok following direction and supervision by the SO</i>	
	2 Records of any monitoring, calibrations and any tests made or assessments carried out, to be kept.	Section 4.10 page 36 of HSD007R	<i>Records kept in departments for at least two years. – Local Rules</i>	
	3. Records to be kept of all monitoring, and of all calibration and maintenance of monitoring equipment. All systems and equipment provided for monitoring and measurements necessary to demonstrate compliance with the Permit, to be regularly calibrated, and also to be checked at suitable frequencies to ensure systems and equipment are serviceable and correctly used.	E and T records kept by SO for > 5 years. SO annual publication "Examination and Testing of Radiation Monitors.	<i>As above</i>	

4 Information				
4.1 Records	1. All records to be legible, made as soon as reasonably practicable, if amended the original and amendments remain legible or can be retrieved, and records to be retained until notification in writing received from the EA that they no longer need to be retained.	Guidance to departments reinforced at Audit Appendix 10 of HSD010R	Local Rules – records checked monthly by RPS	
	2/3. All relevant records relating to previous and current permits to be kept on site.	Section 4.10 of HSD007R	Departments policy/Local Rules -	
4.2 Reporting	1 -2. The University to supply information to the EA named contact in terms of ra waste disposal and such other information as may be required, in formats and timescales as required by the EA.	Duty of University RPO and SSA to complete and dispatch records as required, Section 2.4 of HSD007R	Monthly supply of all info to the SO –in Local Rules	
4.3 Notifications	1-5. Notification (via the Safety Office) shall be given to the EA/Police if non- compliance, loss or theft of material or breakdown of any plant or system that may generate significant release amounts of radioactive waste(even within permitted accumulation limits) Full details can be seen in section 4.3 of the Permit. Also notification to be made of cessation of work with radioactive substances, change of corporate name address or legal entity	Section 2.2 (8) of HSD007Re.	Local rules require reporting of all relevant incidents to the SO	