

Extract from the minutes of 9th SD:SPUR Project Steering Group (PSG) meeting held on the 23rd November 2006, Birmingham.

7.3 Task 3: Regulatory framework paper – outline contents (Paper 51)

7.3.1 Contractor's introduction

Paper 51, 'Preliminary Outline of the SD:SPUR Information Paper on the UK Regulatory Framework for the Management of Decommissioning Wastes' was introduced by the paper's author Marion Hill.

The scope of the paper covers all nuclear sites and all sites that may have radioactive waste, both onshore or off. The format follows the regulatory framework paper produced for the SAFEGROUNDS learning network. The paper states what the relevant regulations are and includes regulators published advice.

Marion clarified the following points and invited comments from the PSG:

- Section 3.3 on Environmental Protection is added in for completeness.
- Section 5.1 – We do now have government response to CoRWM
- Section 7 – The word 'assets' won't be used here.

7.3.2 PSG comments (contractor's response in italics)

Comments on Paper 51

- (a) Check IWS guidance documents for relevant references.
- (b) The NDA is not a regulator but their role should be discussed in the paper.
- (c) Will the document cover conventional safety as well as radiological safety – *This will be covered in section 6.3 – health and safety at work*
- (d) Will Part IIA be covered? – *Part IIA is solely about contaminated land and therefore will not be included in this document.*
- (e) Information on non-hazardous waste and landfill tax is missing – *Inert hazardous and non-hazardous wastes are all part of controlled waste.*
- (f) There are issues with terminology. One of the problems with 'non-radioactive' waste is the focus on the radioactive side of things. 'Conventional waste' is not a great term either.
- (g) What about effluents and wastes? Are other phases included in SD:SPUR project? These are reliant on containment - LLW sludges? - *The other levels of waste will be mentioned but only briefly.*
- (h) Will ILW be included (You might generate LLW from ILW)? – *The paper will define ILW and mention relevant policy.*
- (i) Should GRA go in? – *This is being rewritten at the moment, but the paper can mention this.*

Comments on the consultation process

- (j) Regulators are human as well - there may be different views from different regulators – *There should only be one regulatory line. There is only a problem if there are two different views from the regulators.*
- (k) There would be problems if the paper was interpreting the regulations – *The paper will not be interpreting the regulations.*
- (l) The problem with the PSG commenting on the paper is related to how you manage the comments, given that the wording will be agreed with regulators.

7.3.3 Way forward

It was agreed that the production of the paper will proceed as set out in the work plan, but with an additional opportunity for the PSG to comment on its factual accuracy prior to publication. The draft will be sent to the PSG for comment at the same time as it goes to all the regulators and government depts. Any disagreements will be apparent and can be resolved before publication.