

Responses from the online form used to gather views on record keeping guidance requirements

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Red = Magnox

Blue = UKAEA

Green = DE

Purple = Gloucester City Council

1 How do you perceive the problems relating to record-keeping and why do you think good practice guidance is required?

- short-term information management is not the same as long-term record-keeping, especially for multi-decade decommissioning programmes
- contaminated land documentation tends to be complex and voluminous
 - difficult to store in secure media
 - not always obvious what are the key documents to retain long term.
- contaminated land investigations can tend to be managed as a series of short-duration 'projects' spread over several years
 - problems associated with continuity of oversight and effective hand-overs of information from one project manager/sponsor to the next.
- These problems exist in other fields of nuclear decommissioning.
- problems:
 - inadequate records
 - poorly categorised/filed making them difficult to access
 - summary information required for the record (to make it easy to know whats in it), metadata required - ie information about the record itself
 - inadequate maintenance such that some become unreadable eg through degradation of the record media (eg paper/ink) or through obsolescence of the electronic system and media used to record the record
 - poor tracking of revisions and updates

- poor contextualisation - ie not being able a record because the context in which it is now being accessed is not the same as that when it was collected
 - references to specific parts of a record rarely point to the particular part being referred to, making it difficult to audit or follow how particular assertions are made
 - poor storage
 - centralisation of site records in a National Archive
 - inadequate records of decisions, and assessments (as opposed to factual information)
- Clear guidance is needed on:
 - the type of records
 - how regularly they should be updated
 - how long they should be kept post closure or remediation of a site
- Although CLR11 includes a procedural guide to Completion/Validation reporting - I think some specific guidance would be welcome
 - it's vital to know what was done, not done, and why when reviewing sites years later - people buying and selling land (individuals and corporates), for regulators trying to make decisions, etc etc.
 - there is a phrase "if it's not written down it didn't happen" - meaning if there's no record, then it's dangerous to make assumptions.

2 What existing initiatives should be taken into account in developing guidance?

- NDA 'national nuclear archive' initiative. What is its intended scope?
- Emerging experience in public recording of land condition and remediation in the context of EPA90 Part IIA and the Planning regime
- Experience of how contaminated land records are being managed under Nuclear Site Licence Conditions
- IAEA Guidance on records - inc decommissioning records
- US Long Term Stewardship programme which includes info on records
- in the UK the SILC scheme on Land Condition Records (through iema)

- European cadastre system and other land register systems (particularly for brownfield development of chem contam land)
- Standardised documents such as the Land Condition Record already exist and their role needs to be considered together with documents such as Land Quality Assessment Reports and Land Quality Statements for which no standard format has been agreed though the EA does produce internal guidance of report formats for the assessment of potentially contaminated land under Part IIa.

3 How would you express the aim, objectives, scope and scale of the project?

- To set out what is meant by 'record-keeping' for contaminated land and its remediation, including a brief overview of the benefits/drivers for why records need to be kept
- To draw a line between 'record-keeping' and 'information management' (if that is agreed to be appropriate)
- To clarify what the existing statutory (mandatory) record-keeping arrangements are and how these relate to each other
- To explain the relevant scope and aims of the NDA's national nuclear archive and the requirements it will place on NDA licensees
- To provide guidance on the questions raised under(4) below
- Review of practice
- Assess applicabilty to nuclear sites
- Devise headings/checklist/ template
- To provide good practice guidance on the records that should be maintained together with timescales etc to enable the effective management of contaminated land on nuclear and defence sites taking into account current initiatives
- what information should be recorded in relation to contam land management processes

4 What records need to be kept, what stages of land management should they relate to, how do they relate to existing SAFEGROUNDS guidance and how should they be kept?

- what records:
 - site/building history
 - geological/hydrogeological context

- sources of contam, type of contam, amount of contam, concentrations/site investigations
 - land quality info from areas not suspected as being contaminated
 - remediation records and the records of decision (ie why was a particular option chosen, which stakeholders were involved in the decision) -regulatory interactions
 - safety cases
 - verification surveys of land condition post remediation
 - monitoring records eg groundwater inc. long term monitoring
 - maintenance records associated with remediation schemes (eg of caps/barriers etc).
- how to keep:
 - electronically (to aid access) and probably also on paper
- Land Condition Record
 - Supporting LQAs and LQs
 - Remediation Validation Reports
 - IPPC Baseline and Validation/Cessation Reports
- records should be both factual (what was done) and informative - a decision record should be kept for every 'key' decision relating to land
 - it's as important to know why things weren't cleaned-up as why they were etc
 - obviously all reporting produced should also be kept, along with copies of all key communications
 - I wouldn't advise requiring specific formats/media for records - though it's worth noting that regulators are now subject to increasing FOI legislation and Electronic access requirements from Government. Most LAs, for example, are required to have online access for a variety of searches in the near future.

5 What do you think is an appropriate methodology for carrying out the project?

- That's what the guidance should help with
- Open to suggestions.

- Working party to assess the results of the survey and devise a way forward
- PSG to approve the way forward then the proposal on the website
- Working group to revise the proposal after consultation
- Drafting group to develop guidance and check list
- Consult with PSG then on the web
- Amend
- Issue

- Workshops involving:
 - Industry
 - MoD/DE sector
 - regulators such as EA, SEPA and HSE
 - NGOs

- literature review, inc oversees - should be wider than just contam land, should include record keeping/knowledge management processes used in similar industries; construction, risk management etc
- then production of best practice guidance - examples, case studies, legal requirements (data protec, company records etc), legal considerations and evidence requirements
- I would favour a general best/good practice review, rather than a highly standardised format/process

6 What outputs would you find useful and what benefits would you anticipate from them?

- A SHORT report addressing the aims given above (3) and (4)
- An accurate account of the existing statutory requirements is a must.

- Guidance
- Examples of practices
- Checklist for application

- Clear guidance on
 - the type, nature and content of the records required
 - how and where they should be stored
 - how regularly they should be updated taking account of current initiatives
 - how long they should be kept
- some form of report - examples of good practice, discussion and implications etc

7 Are there any specific tasks that need to be undertaken within the project and are there any particular timing issues?

- Not aware of any
- Sites are being delicensed or are consulting on End Points now - thus the requirements for records is required sooner rather than later
- Guidance on records is a big hole in the SAFEGROUNDS guidance - production of the guidance should therefore be sooner rather than later for SAFEGROUNDS to be the leading initiative with respect to practices on conland
- Unsure at this stage

8 Who should the stakeholder participants be for the project, what are their roles in record-keeping and do you have useful contacts you wish to suggest?

- No views.
- NDA, MOD - they own the liabilities and want to know what they are
- Site Licence Companies - need to know what's there in order to be able to manage it. They also need to present the NDA/MOD with a record of land condition so that NDA/MOD understand their liabilities
- Regulators - want to know what's there and what's being done about it. Also the basis for the decisions
- Local Liason Groups, Local Authorities, Public - as above, see regulators
- See Qu.5.

- DE - Head of the Environmental Management Group (responsible for managing contaminated land on defence sites)
- EA - Sheena Engineer/Mike Hargett - set policy and guidance on the assessment of contaminated land including report formats for Part IIa inspections. Also involve PSG EA rep for input from the nuclear regulatory perspective
- SEPA - Equivalent to EA contacts
- HSE - use PSG rep
- NGOs - those with experience of reviewing records provided for nuclear and defence sites so we can learn from their experience - use existing PSG reps
- owners of land, consultants, property lawyers (due diligence), regulators (LAs & EA). . .

9 Are there any other issues we should be aware of in developing the project?

- No response
- NDA national archive?
- Take account of existing initiatives and documents
- E-Government Initiative