

In Confidence



sharing knowledge
building best practice

UN-ATTRIBUTED SUMMARY of:

Minutes of the SAFEGROUNDS Good practice Guidance for Records and Record-Keeping Scoping Workshop (Workshop 1)

Held on 2nd May 2006

IOD Hub, Birmingham, One Victoria Square, Birmingham, B1 1BD

1. PRESENT

Low Level Radiation Campaign
Nexia Solutions
Serco Assurance
University of the West of England
CIRIA
NDA (by conference call 10pm – 12pm)
Iron Mountain
HSE
Defence Estates
CIRIA
UKAEA
Magnox

2. APOLOGIES FOR ABSENCE

British Nuclear Group
MOD
AWE
EA
SEPA
Gloucester City Council

3. INTRODUCTION AND WELCOME

CIRIA thanked those present for their attendance and introduced the background and objectives of the workshop. This is the first of two workshops for the record keeping project. The purpose of this workshop is to generate stakeholder involvement in order to refine the technical scope of the guidance. A later workshop will take place to engage in the development of generic guidelines. For those not present there will be opportunities to consult electronically. Preparation for the first workshop included circulation of relevant steering group meeting (30 March) notes and a Serco paper (containing core questions to be considered). In terms of deliverables, the aim of the first workshop was to work towards a first full draft of the guide by 23 June.

Apologies for absence were noted as above.

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4. DISCUSSION OF TECHNICAL SCOPE, LED BY SERCO ASSURANCE (NOTE: SERCO ALSO TOOK DETAILED NOTES)

4.1 Key aspects of the project

Serco presented slides on the six key aspects of the project in order to refine the technical scope. These slides were modified and added to where appropriate as discussions took place and amendments were agreed on.

The key aspects discussed were; key stakeholders, site types, potential elements site life cycle, contaminated land management objectives, contaminated land management issues and contaminated land management process.

The various types of contaminated land records that may need to be stored were also discussed.

4.2 Key questions

Serco presents a number of key questions regarding the scope of the guidance. The key issues emerging from discussions are listed below:

- (a) The guidance should contain an indicative list of records, not prescriptive, with references to other codes of practice (e.g. C&EWG CoP), says why you need it in relation to contaminated land
- (b) The guidance should clearly explain rationale for leaving things out and indicate where there are other systems.
- (c) The guidance should avoid getting into procedures and how records are used.
- (d) A member present will provide the research contractors with information on IAEA guidance for decommissioning.
- (e) A member present will provide the research contractors with information on munitions.
- (f) It is important to mention in the guidance that the development of the NDA national archive is happening in parallel. The NDA National Archive will be a high level archive with key documents only. NDA has electronic document management system but this is not the start of the national archive. Mention of who is leading on this for NDA. It could be useful to make recommendations in the document about what the NDA national archive should contain. NDA will provide information from relevant contact on the drivers and scope of the NDA national archive.

Further discussions:

Data on safety management

- Connects to confidence building
- Connects to CDM file
- Contaminated land safety cases
- Risk assessment – connect to contaminated

Asbestos example. Register for CL with equal respect.

Methods of retrieval to answer questions

Intra-organisation communication

Organisational structure

There are QA requirements in terms of quality of data rather than about what records should be kept. This is about activities.

- (g) From the perspective of one of the members present - Currently record keeping decisions are left to individuals but guidance would be useful. There is a mind set in this organisation that all records are finite and will be destroyed at some point. (discussion of contrasts with NDA where assumed approach is to keep.)

- (h) It would be good to learn from international experience. There is a different approach in the US with greater emphasis on regulators to hold the records and more prescriptive approach. US Stewardship programme is a possible example. A member present will provide information on the US Stewardship programme.
- (i) From the perspective one of the members present – Generally not prescriptive, but an obligation to maintain appropriate standards that are set. Reference to ‘Licence Conditions’ (on website). There is internal record keeping guidance for own systems and the organisation will provide the research contractors with this. Reference to new SAPs.
- (j) The approach of the Environmental Agency to record keeping was not known by those present. It would be useful to ask the EA about this. CIRIA will provide Serco with an EA contact.
- (k) If records are to be stored for a certain period it is important to recommend this decision should be reviewed at the disposal date and that intelligent decisions can be made at this point by an appropriate person.
- (l) The period that records should be kept for should be specified in terms of life cycle rather than a certain number of years.
- (m) One of the members would check record keeping standards of their organisation and feedback to the research contractors.
- (n) There are possible complications, e.g. it can be thought as better to destroy all records if the record set is incomplete. If the incomplete set is kept and the requested record is the one that is lost then this looks bad.
- (o) It is important for the guidance to consider records beneath regulatory standards, offsite materials, SoLA except material. It is agreed that there are many reasons to keep records that demonstrate that the site is ‘clean’.
- (p) Security is an issue. Records should be free from security clutter (i.e. documents should not contain sensitive material where unnecessary) and remain open where possible. The Freedom of Information Act must be mentioned in the guidance.
- (q) It would be useful to get the perspective from local authorities. CIRIA will provide Serco with LA contact.
Reference to Land registry and control over Part IIA regs.
- (r) A glossary of terms is very important. One of the members present will provide the research contractor with some information on definitions relevant to their organisation (Land Quality Statements, etc)

4.3 Technical content

- (a) There is a need for a process plan that links to SAFEGROUNDS. Some concept of the overall process for Land Quality, as being advocated by the SAFEGROUNDS approach, should be referenced by the record keeping guidance. It was discussed that such a process is inherent in the SAFEGROUNDS guidance and CIRIA will make Serco aware of this.
- (b) The Land Quality file should contain records of the decision as well as records of data. If a particular activity isn’t being done the file should contain a record of the decision process.
- (c) A road map to the documents would be very useful but it may be too much work.
- (d) Brownfield redevelopment issues will not be ignored. It would be useful to find out what is being done and benchmark against this. English Partnership may be a good organisation to approach perspective. CIRIA will try to assist with finding an EP contact
Is there potential to seek expert advice to assist with the brownfield issues? Serco will consider the options for dealing with this section of the guidance
- (e) There is a shifting perception of risk, so it is important to record all data, including that relating to contamination levels below the current regulatory concern
- (f) The inclusion of flow diagrams would be very useful.
- (g) The guidance must not just be an essay to read and ignore. It must be pragmatic, readable and usable by those on sites.

- (h) The guidance will include case studies of good or bad practice or just practice. The research contractors are relying on the steering group members to provide case studies and anecdotes. Case studies where sites have been remediated and confidence is lost would be particularly useful. **One of the members present** will look for further information on **one of their projects**. CIRIA will support Serco on case studies/ anecdote collection by sending an email reminder and collecting information from the PSG **Another case study is suggested**. **One of the members present** will investigate the possibility of a colleague presenting at the next workshop on good practise case studies **from their organisation**.
- (i) Use 'land quality' rather than 'contaminated land'

5. NEXT STEPS

The second workshop will take place at the beginning of June and the first full draft guidance will be prepared for the 23rd June.

5.1 Scope of the 2nd workshop

The second workshop is an opportunity to bring or send colleagues who are responsible for record keeping. It will take place in early June, 5th, 8th or 9th June. CIRIA will circulate dates and confirm availability

One of the members present will get back with which out of the 8th and 9th is a possibility.

A questionnaire will be used to gather information about existing systems and the management of existing systems. The questionnaire should be sent to both centralised and land quality people. Iron Mountain will modify the questionnaire before it is circulated. It is agreed that BE, should be invited to the second workshop

More details draft contents of the guidance will be circulated two weeks before the second workshop.

CLOSE