

# In Confidence



sharing knowledge  
building best practice

## UN-ATTRIBUTED SUMMARY of:

### Minutes of the SAFEGROUNDS Good practice Guidance for Records and Record-Keeping Second Workshop

Held on 8<sup>th</sup> June 2006

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

#### 1. PRESENT

Nexia Solutions  
UKAEA  
UKAEA  
Serco Assurance  
University of the West of England  
CIRIA  
Iron Mountain  
HSE  
Gloucester City Council  
UKAEA  
NDA (present from section 6 onwards)  
SEPA  
Nirex

#### 2. APOLOGIES FOR ABSENCE

EA  
Low Level Radiation Campaign  
BE  
British Nuclear Group  
NDA  
MOD  
Defence Estates  
Magnox  
NDA  
AWE

#### 3. INTRODUCTION AND WELCOME

CIRIA welcomed and thanked everyone for coming. Brief introductions were given by those who were present.

Apologies for absence were noted as above.

#### 4. REVIEW OF THE MINUTES

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It was agreed to make the following amendment to the minutes from the last meeting.

- Page 3, section 4.2, part i - Remove the word 'handbook' from the phrase 'licence conditions handbook' and correct spelling of 'licence'.

Updates were given on the following actions from the previous meeting.

- *A member present to provide info on munitions* – JRK has spoken the member and the information should be emailed to the research contractors soon.
- *A member present to provide info on drivers and scope of the NDA NNA* – CIRIA has engaged with the NDA and has been in contact with information manager. CIRIA has arranged to meet on Tuesday evening (13<sup>th</sup> June, 7pm, London) but said he would be happy to rearrange this to allow others to attend. It is agreed this contact would be a suitable person to talk to and that the meeting on 13<sup>th</sup> should go ahead to get NDA input soon. It would be useful if the research contractors could attend this meeting. This contact has been working to develop a proposed strategy for the NNA. It was unclear as to how far the NDA had progressed with the NNA and getting information on this as well as more active engagement with NDA was very important. A member present has some PowerPoint slides from contact about the NNA which he might be able to circulate but this will need to be checked first.
- *A member present to provide info on US Stewardship programme* – Information has been sent to the research contractors. There is lots of information there but no clear summary of this information available.
- *A member to check record keeping standards of their organisation and feedback to Serco* – Not yet.
- *A member to pass on information to Serco on definitions relevant to their organisation* – Not yet.
- *CIRIA to assist with finding English Partnerships contact* – Contacts have been given to Serco. JC feels that there isn't a body of work out there so this is perhaps not worth following up.
- *Serco to consider options for dealing with the brownfield issues in the guidance* – It would be useful at least to send the relevant person an email. As a member present knows him better, he will send an email. The other contacts haven't been contacted yet.
- *A member to investigate further information on a case study from their organisation* – Not yet.
- *The research contractors to prepare the first draft of the guidance by 23 June* – This deadline has been changed to the 30 June on the request of Serco
- *CIRIA to invite BE to next workshop* – done.

It is noted that there is no specific action on the research contractors in the minutes to provide a correct and appropriate glossary. However the need for this is acknowledged by Serco and is being taken forward - it will be included in the first draft of the guidance.

## 5. IRON MOUNTAIN TO PRESENT ON 'GENERIC' RECORD KEEPING

Serco thanked everyone for the comments on the draft contents up to date. The general theme of the comments is that the contents list seems comprehensive but perhaps the good practice section should be up front. It will be important to get a balance between a flowing narrative and a technically comprehensive document. Serco hopes that an idea of how to strike this balance should come out of this meeting.

Serco would welcome any further comments that may come in from PSG over the next week, from both those present at the meeting and those who are not. These comments should be sent via CIRIA.

Serco introduced Iron Mountain to present on the 'generic' record keeping systems good practice. This presentation followed the structure of section 4 of the draft contents

document. Only two responses to the questionnaire have been received. These were useful but the others should be chased up, particularly British Nuclear Group.

## **ACTION: SERCO**

Iron Mountain presented on the following:

- Brief overview of Iron Mountain
- Input from Iron Mountain for the guidance
- Importance of good record keeping (Shell study 1998) – 60% of time spent looking for information
- Drivers for/strength of successful record keeping scheme
- Recommended approaches
- Record keeping life cycle –active/inactive management
- Best practice standards – ISO15489 - list of recommendations rather than accreditation
- Six stages to compliant records management – organise – assess – develop – implement –manage – audit.
- Best practice areas
  - Retention – record groups, classification scheme, retention periods
  - Policies and procedures – single set applied consistently
  - Access and indexing – metadata, version control, preservation (BS5454 and preservation index), security etc
  - Disposition – review, authorisation, appropriate method.
  - Audit compliance and accountability – oversight of scheme, executive ‘buy-in’ useful
- Media options – all paper – mixed – scan everything
- ‘Single open access’
- Case studies – Probate service, DTI – coal miners’ compensation scheme, BAE systems.

## **DISCUSSION**

The following, often exploratory, points came up in discussion following the presentation:

- (a) It was re-iterated that the guide should contain checklists of best practice and case histories outside the main document.
- (b) Serco asked the PSG how we get from a departmental record system to the ‘all-singing, all-dancing’ company wide system that Iron Mountain has been talking about. The document needs to be relevant to the readership. If best practice is an organisation-wide system then decisions about this will be made at a high level.
- (c) Is the vital part of record keeping coping with discontinuity, rather than the more detailed minutiae of day to day record keeping?
  - Continuity can be affected by changes in the law that affect ownership and control relationships within the industry
  - Conversely it is argued that there are lots of discontinuities due to organisational change and changes of contracts. NDA are site owners and they archive at a high level only. Tier 1 contractors effectively operate the site but rely on potentially large numbers of contractor to do the work. Companies may hold onto the data they’ve got and data may be lost between companies as work is won and lost. This interface problem should be highlighted in the guide.
- (d) The NNA will be historical rather than operationally available – not technical detail.
- (e) The guide should be about achieving best practice – not how to do it – not methodology or recipe book – more like a check list of what system should do.
- (f) It is important to reference into the SAFEGROUNDS process
- (g) The concept of a ‘Land quality file’ that was discussed at the last meeting, a place for all important documents that exists and has to be managed is suggested.

- (h) Checks before disposal are very important, a review process for intelligent decisions to be made in the future.
- (i) Environmental conditions (temp and humidity) or disaster – which is more of a risk? Flooding in basement example.

## 6. NIREX TO PRESENT ON ITS ROLE IN INFORMATION MANGEMENT

Nirex is an organisation independent from waste producers and deals with the long term management of high and intermediate level waste, looking at storage facilities for radioactive waste and advising the industry conditioning and packaging of radioactive waste through the Letter of Compliance Process.

Nirex has been involved in work on information management. Record keeping is just a part of this. Information dispersal is the aim and records and record keeping are seen as tools.

Nirex presented on the following:

- **Information management drivers** - openness and transparency is key – when a document is created the initial assumption should be that everything goes into public domain.
- **Threats to loss of records** – organisation change – UKAEA created in 1950's, ongoing change happening from then. **Point made about potential for loss of information.**
- 'Managing Radioactive Waste Safely' document indicates *records managements was never a priority* – secondary importance.
- **Nirex activities:**
  - **2001-02 study on records media** - result was that the system around media was much more important than the media itself – the system has to recognise limitations of media.
  - **Records migration trial 2004** - Letter of advice/letter of compliance (LoA/LoC) records identified for trial
  - **Outcome of migration trial** – 30 linear metres of records copied, A4 paper mainly, special photocopier, acid free paper, copper lined bags, acid free card boxes, to Iron Mountain facility – copies transferred to managed archive – samples produced for regular monitoring – proved process – costs £17,500 + £100/m storage – 3 months to complete – glossary, list of abbreviations, terms etc
  - Objection to the term 'preservation' - makes people think about museums and that it is not an active process. Reviewing information and making sure it still makes sense is vital.
  - **Input to a records migration exercise** - some condensing as had run out of space – success
  - **IAEA safety report** – document - International Council of Archives (ICA)
  - **Conference with NIRMA** – Nuclear Information Records Management Association
- **BRIMS** – 'British Radwaste Information Management System' – One tool of many.
- **Other initiatives:**
  - **RWPG sub group** – provided guidance to nuclear industry – subgroup on information management – Draft Code of Practice
  - **NDA 'Knowledge Management' strategy** – on website 6 weeks ago
  - **NDA 'National Nuclear Archive'** – industry wide information and records store – doesn't cover all sites.
  - **National Archives interests**
- **Access to information is key** - ensuring the same meaning from time of creation to time its being used.

- Hand over to the next generation– different requirements and technologies

## DISCUSSION

The following points came up in discussion following the presentation:

- (a) It is agreed that this was a very informative and useful presentation, so how do we use this information? There was lots of relevant information and it would be useful to use the 'Letter of Compliance' and other information as case studies
- (b) The issue of access is key – not just accessing the records themselves but preserving the understanding and intended meaning of that record.
- (c) In some circumstances H&S considerations can get forgotten. It should be borne in mind that if repeated investigations have to be carried out, because records have been lost, this can lead to added risk of exposure to those carrying out the investigation.
- (d) NIREX is also working on a material archive – pieces of graphite and steels etc. These are being collected together for future analysis – particular interest in radionuclides.
- (e) On project management side, there is a tendency at end of a project to have created some information and then to ask what now? In fact, the project should be looking at what information should be created and what should be happening to it from the start of the project. The costs for record management should be built in at the start of the project, so you are creating the information after the need has been identified at the start of the project. Record keeping costs should be in the project proposal and shouldn't get cut out.
- (f) The cost of losing data is so enormous (sometimes tens of millions of pounds) – and this example of record keeping seems quite cheap relatively. The cost of losing records should be stressed in the document.
- (g) What about records that we don't need at the moment? Should we be storing cores from geological samples? Societal values will change, regulations will change – chlorine 36 wasn't a big issue but it is now.
- (h) **View expressed that in 1997 NIREX lost public inquiry for Rock Characterisation – weren't taking societies view into account. It is important to preserve information that is not necessarily 'scientifically significant' but of importance to local communities and society.**
- (i) 'Public confidence' should be added to the drivers list (section 3) in the draft contents document
- (j) The records should be assumed to be for the public domain, unless there is some reason why they shouldn't be.
- (h) There is some discussion around whether including organisations' bespoke solutions will date the guide quickly or be useful for the reader. It is agreed that showing that there is a solution now is beneficial. The guide should not be recommending any particular system, but should include these case studies for reader interest and to make the guidance feel 'real and possible'.
- (i) It would be good get the complete set  
**A member present** should be able to provide information for a case study **from their organisation**. The ultimate deadline for this is September.  
 Iron Mountain will prepare case study info on the Iron Mountain system for the first draft  
**A member present** has sent to the contractor a flyer on 'IMAGES'. This flyer will go into the first draft as it is. If there are issues with the format it can be changed for the second draft.
- (k) Transferability of files is an issue. The raw data should be in a format that is 'nothing fancy' and 'off the shelf' e.g. excel used by BRIMS and IMAGES
- (l) You should put yourself in the user's shoes in future. It is essential to know extra information – errors, analysis method, detection limits etc.
- (m) The ICA document (*Radioactive Waste Information: Meeting our Obligations to Future Generations with Regard to the Safety of Waste Disposal Facilities - ICA Study 18*) is available on ICA website for downloading ([www.ica.org](http://www.ica.org)). There is a

diagram in back that shows that there are lots of information sources that are linked. Information about how information is managed, where it is, who manages it and the links between information is important. Links to what the information is and what the purpose of collecting this information is the context that turns data into information.

- (n) Seminar in middle of October – IAEA on record keeping/information management
- (o) It is important to see the RWPG CoP. A member present knows a contact at the RWPG. He will speak to him and ask for copy – the CoP is at the development stage.

## 7. UKAEA TO PRESENT ON IMAGES

Following on from Iron Mountain presenting on generic record keeping, UKAEA gave an overview of how UKAEA collect and manage land quality data

UKAEA presented on the following:

- Background to 'IMAGES' - LQ information has to be used today for decommissioning and kept long term for site end points etc. IMAGES was developed in 1999 and no 'off the shelf' alternative was available.
- Key requirements of IMAGES – constancy – context for data - integration with ArcGIS.
- IMAGES handles lots of disparate sources of information – There is a contaminated land focus on the data, it is not just a matter of sorting the data.
- IMAGES is structured with modules – documents, photographs, building histories, excavation manager, invasive & water module etc.
- There is a 'land assessment' module that sits over other bits of information.
- The site is split into zones and areas – there is a chronological record of works carried out within areas.
- GIS is used as a tool to aid interpretation
- Intranet is used for summary information, to integrate CL within other site based activities.
- IMAGES/GIS example uses – e.g. production of Land Condition Records
- Results of implementation of IMAGES and GIS – e.g. improved awareness, time saving.

## DISCUSSION

The following points came up in discussion:

- (a) This is great but is it record keeping? IMAGES is a system for managing data and using that information for day to day operation of the site.
- (b) Serco gives example of North Wales system. This was set up and not maintained. The technology became out of date very quick and the system didn't survive – it was plundered for its raw data.
- (c) Practitioners like IMAGES – GIS is great, but its dependant on technology that will become outdated. But if the map is used for understanding, then map has to be in format that is not dependent on GIS system. There is a conflict between using technology for accessibility and preserving information – technology tends to become out of date quickly. Active management is ideal but the system doesn't work after active management ends.
- (d) IMAGES enforces the principle of collecting data in structured way – the additional information you have to collect (for context) needs to be in guide.
- (e) IMAGES gives the structure and management and should be used as a case study. This should be mapped to record keeping process for reader interest.
- (f) It is also important to use the life cycle of a site and map onto SAFEGROUNDS process.

- (g) IMAGES could be used as a worked example for section 4 in the document. Iron Mountain will need to obtain a copy of the presentation and further communications with UKAEA.
- (h) Compatibility between IMAGES and EDMS will not be a problem until it is time to archive IMAGES. By then there may be a standard digital preservation format.
- (i) Link between IMAGES and EDMS? IMAGES doesn't duplicate records, but controls the understanding of the information. EDMS regards IMAGES as a database, doesn't need to talk to IMAGES. In the future it will be archived into EDMA as a database.
- (j) The auditing process and security of underlying source data for IMAGES is discussed. What is the original/core record? Is the original record stored in EDMS, in IMAGES or in someone's office? Should IMAGES be sending data to centralised records periodically during active lifetime of system?
- (k) It seems that archives operate at a corporate level and active records are managed departmentally.
- (l) The active and non-active stages should be flagged up in guide. Sites become live again, as sites change hands. Records can become active again many years later.

## **8. SERCO TO PRESENT THEIR PAPER CONTAINING THE OUTLINE STRUCTURE AND CONTENTS**

The draft contents have been structured around working through the problem. It has been suggested that readers might want the guidance moved forwards.

- (a) What needs to be done should be upfront.
- (b) But also, context and aims are very important.
- (c) The bulk of the document should be on what needs to be done.

It is agreed that in producing the first full draft the research contractors should follow this structure but have some flexibility when it comes to making the document readable. The RCs will populate the various sections then rearrange to make readable.

HSE will submit comments on the contents list to Research Contractors by email.

The following points relating to the draft contents document are discussed:

- (a) Stakeholder issues/public perception should be in section 3 under 'drivers' This comes out of NII SAPS (Supporting document for NII SAPS DS333)
- (b) BPEO and EIAs have their own set of requirements – records needed for these. This needs to be in the guidance somewhere. There is joint guidance on SEPA and EA sites on BPEO (should be on SEPA and EA websites)
- (c) The RCs confirm that 'areas' in section 2.3 refers to topics rather than geographical areas
- (d) The first bullet point in section 2.3 uses the term 'project'. This implies finite projects. 'Lifecycle' might be a more suitable word
- (e) 'Transparency' is in section 3.2 'Business Drivers' – This is clarified. If the NDA say transparency is needed then this becomes a business driver.
- (f) Pre-use surveys for sites are mentioned. These should be under the license application.

CIRIA will get any comments on draft contents from those attending and not able to attend the meeting.

## **9. ANY OTHER BUSINESS**

It is agreed that it is important to get something on the NNA in the first draft and to engage with the NDA on this as soon as possible. CIRIA can meet with **NDA contact** on Tuesday

13<sup>th</sup> June and use it as a pre- meeting if necessary. He is open to setting up a second meeting. Others are keen to attend another meeting with Simon should it go ahead NDA are paying for this, but the work is wider than NDA sites. This should be an issue. The main aim of the meeting is to establish the expectations for the NDA National Archive – What will be expected from the sites for the National Archive? It is possible that the NDA might not be able to answer questions, depending on how far this has been developed.

Don't overlook British Nuclear Group and AWE. There needs to be a positive effort to engage as they have an important role.

..... questionnaires that haven't been returned should be chased.

It is agreed that it will not be necessary to meet again as this group. The PSG meeting in July can be used as a sounding board and further consultation will take place electronically.

**CLOSE**