

Good Practice Guidance for Land Quality Records Management – Summary

VERSION CONTROL

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1 Synopsis

Record keeping has been identified by SAFEGROUNDS as one of the five key principles for the management of contaminated land on nuclear and defence sites. The Principle states that:

“Site owners/operators should make comprehensive records of the nature and extent of contamination, the process of deciding on the management option for the contaminated land and the findings during the implementation and validation of the option. All records should be kept and updated as necessary”.

The term “contaminated land” is used in defining the SAFEGROUNDS remit, but this guidance document uses the term “land quality” to be more neutral and comprehensive. As an example, there may be land to be sold or de-licensed that is not contaminated but for which land quality records will be very important.

The objective of this guidance is:

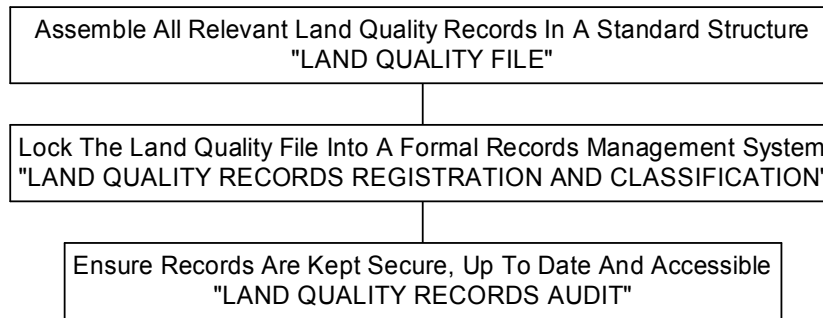
“To produce a good practice guide on records and record-keeping for contaminated land and land quality which addresses the knowledge requirements of nuclear and defence sites and their related stakeholders”

The guidance applies to all nuclear-licensed sites and to defence sites for which a change of use and/or ownership is planned. It is aimed at the organisations that are responsible for managing the contaminated land interest on these sites (eg site owners, site licence companies and their agents) but will also inform other stakeholders such as regulators, policy makers, non governmental and community based organisations. It has been written to address the need for clarity on the drivers to create records and to provide practical guidance on clearly recording information and setting up and maintaining the record. The ultimate objective is to make information accessible in such a way that it leads to the enhancement of land quality knowledge.

The expectation of regulators, owners, investors, site workers and the wider public for nuclear and defence sites is that records on land quality should:

- contain all the information that may be required in the future
- be accessible to those who wish to consult them
- be assembled and maintained in a secure form.

In order to meet these expectations, this guidance sets out a three step process:



This guidance introduces the concept of a “Land Quality File” to be created for each site with a suggested formalised structure for the records that should be retained to cover each of the relevant topics for land quality. The contents of the Land Quality File should be kept referenced, registered and updated in the main records management system of the organisation responsible for the site to enable its proper maintenance, access and preservation. Regular audits should be carried out to ensure that the records are kept up to date and accessible.

Professional records management expertise already exists in the organisations responsible for the sites covered by SAFEGROUNDS. It is important that contaminated land technical staff work effectively with their records management colleagues to ensure the records of relevance to land quality are appropriately kept in the main records management system. The aim of this guidance is to signpost the types of land quality record that should be kept and the ways in which they can be secured within the formal records management system for the site.

By consistently following this good practice guidance, the ability to locate information and meet the knowledge requirements of those with a stake in the land quality of a site will improve. This interest will last the lifetime of the site, which in some cases will outlast the organisations currently responsible for them. Consequently reliance on operational filing systems, “shared drives” and local archives on their own may ultimately fail to provide the long term knowledge transfer required given the organisational changes that will inevitably occur over time.

The guidance should be used to identify:

- Why it is important that land quality information should be recorded – Section 2
- What land quality information should be recorded and in what form – Section 3
- How record keeping systems are structured and maintained – Section 4

2 Importance and Benefits of Good Record Keeping

Comprehensive records and an efficient record management system are hallmarks of a professional organisation in control of its responsibilities. The cost and implications of losing land quality data can be enormous and the benefits of good record keeping can be realised comparatively cheaply.

Successful contaminated land management is about achieving safety and environmental protection and stakeholder confidence in way that represents value for money. Good record keeping is key to achieving this because without reliable records work may have to be redone and things could go wrong that should have been avoided. No matter how good the investigation, assessment, decision making and clean up is for a site, if it is not recorded in a way that is comprehensive and accessible to future stakeholders it can soon be treated as though the work never happened. The cost of regaining knowledge on nuclear and defence sites can be very high and may involve exposing workers to chemical hazards and radiological doses. If an effective records management programme is consistently applied to land quality, issues regarding information loss are less likely to arise and knowledge transfer and enhancement is more likely to occur.

Organisational change, increased stakeholder expectations of access to information and regulatory requirements are combining to force improvements and standardisation to record keeping. Openness and transparency are necessary to win confidence in a site and evidence of informed decision making is required

to justify actions. This places a greater onus on record keeping to be able to meet the information needs of stakeholders in a way they can access, understand and accept as satisfactory. In the future the success of contaminated land management will be increasingly judged on the quality of its records and record keeping.

3 Knowledge Requirements

The site owners of the land (the NDA, MOD, British Energy, etc) require records to be held and kept for the long-term and to be available to be passed on to new owners if appropriate. Information that must be retained to enable knowledge of the land quality of a site to be transferred to future generations includes:

- history of the site
- contaminants of potential concern
- selected management options
- use of controls along with their monitoring and maintenance records
- any other information judged necessary for succeeding generations to understand the nature and extent of the residual contamination

This poses a great challenge as the contaminated land interest in a site may lie dormant for many years and for nuclear licensed sites in particular it is a requirement that radioactively contaminated land should be continuously managed from the time of the contamination event, time of burial or time of discovery until remediation is completed, which may potentially span decades or centuries.

In the context of the UK contaminated land regime, a requirement for record keeping derives from the implicit need for owners and occupiers of nuclear and defence sites to be able to respond to queries from the local authority or environmental agency (EA or SEPA) on the condition of the land and if necessary to establish who are the “appropriate persons” responsible for any identified contaminated land.

On nuclear licensed sites, the regulatory requirements for operators to ensure that adequate record keeping arrangements are made and implemented are set out in licence conditions and under the Nuclear Installations Act 1965 (NIA65). The Site Licence Companies (SLCs), which in most cases are not the site owners, are legally responsible for managing all records on their sites and are expected to maintain information following good practice.

In order to raise the awareness and standing of contaminated land record keeping and to have a structure that good practice principles can be applied to, this guide introduces the concept of a “Land Quality File” to be created for each site with the following suggested formalised structure for the records that should be retained.

- 1 Overview Document
- 2 Document Management Information
- 3 Land Referencing Information
- 4 Current and Future Land Use
- 5 Surrounding Land
- 6 Controlled Waters
- 7 History
- 8 Desk Study And Factual Investigation Information
9. Live index of areas of potential concern
10. Time-series monitoring results
11. Interpretations and assessments
12. Management of the Contaminated Land

Annex 1 Record of Regulatory Authority Information Relevant to the Land

Annex 2 Record of Site Owner Requirements / Contractual Information

Annex 3 Record of Desk Studies and Investigations

Annex 4 Record of Stakeholder Involvement

Annex 5 Other References

Annex 6 Copies Of Other Key Documents

This file will be a live management tool and it is anticipated that Sections 1 and 2 (the Overview Document and Document Management Information Sections) will be used to provide stakeholders with an up to date picture of the land quality status of the site and a guide to the available information. Subsequent sections are structured with the Source – Pathway – Receptor model of assessing contaminated land in mind, recognising

this to be a dynamic feature of the sites given the likely changes in use and length of timescales involved for many of them.

Information on the site and its surroundings given in Sections 3 to 7 provides the context and foundation for all subsequent contaminated land assessment and decision-making. Emphasis is drawn to the importance of recording drawings and photographs, which can be some of the most useful sources of information but also some of the most difficult to capture.

The aims of Sections 8 to 11 are to build up a comprehensive body of information, including a realistic conceptual model and a robust risk based analysis of the data. Section 9 is intended to be a live document that keeps track of knowledge on areas of potential concern, some of which may have been identified in a desk study then closed out by subsequent investigation or remediation. Section 10 will build up a time-series picture of the changes in land quality on sites that have groundwater and / or soil gas monitoring programmes and the results of these should be used to update, confirm or challenge the interpretations and assessments in Section 11.

Section 12 draws together the planning, management, remediation and / or delicensing actions taken to address land quality issues for the site. It should be used to systematically record the management structures and resource planning, the control and minimisation of contamination, the development of strategy through objective setting, options appraisal and decision making and the implementation and verification of actions to meet the ultimate stakeholder requirements.

4 Records Management

The contents of the Land Quality File should be kept referenced, registered and updated in the main records management system of the organisation responsible for the site to enable its proper maintenance, access and preservation. This record keeping entity should be given sufficient status in the management documentation system of a site to ensure that it is populated and consulted appropriately and that it is publicised and promoted to ensure that the benefits of good record keeping are realised.

The organisations responsible for contaminated land record keeping on nuclear licensed or defence sites have existing records management systems. The guidance here is not intended to challenge the knowledge of current practitioners or records management professionals in these organisations but instead attempts to signpost good practice in the handling and processing of records and information, particularly at the point of interface between the contaminated land managers and those charged with managing the information in order that it is retrievable for present day and future reference.

To effectively and efficiently provide information to users, record-keeping systems require good information management and retention schedules in order to be able to find the requested information and to ensure the information is kept for the appropriate period. Such systems will typically include the following record keeping processes:

- records creation and capture
- registration
- classification
- storage and handling
- access and use
- tracking
- disposition

These processes require consistently applied policies and procedures to “operationalise” or bring to life an organisation’s records management programme. It is incumbent upon contaminated land managers to ensure that the appropriate records policies and procedures are adopted as a compliance programme within the standard business processes in their area. Compliance audits should be conducted at least once each year. As a minimum the audit should include verification that:

- hardcopy records sent to inactive records storage are adequately indexed to support timely retrieval
- vital records are being adequately protected
- verification that electronic records, including e-mail, are being properly managed
- records management training is being provided to all personnel with any kind of responsibility for records.