



Revised Exemption Orders An Industry Perspective

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Engagement with DECC

- Significant engagement with DECC throughout the review programme
 - Formal representation on the DECC Programme Board
 - Supported various DECC expert working group meetings and discussions
 - Supported response to Government on RIA
 - Supported and attended DECC Stakeholder Workshops

Key Changes for Industry

- **Out of Scope** – effectively **Excludes** material below the values from control under the Regulations / Act – ‘replaces’ SoLA and Schedule 1
- Values based on RP-122 so risk based and links back to the Basic Safety Standards – some winners some losers
- Also descriptive **Exclusion** for contamination from normal discharges and Naturals
- **Exemption** from Authorisation based on VLLW definition
- Some activity in aqueous liquids will be **Exempt** but limited
- Non aqueous liquids e.g. oil and mercury treated as solids

Implication for Industry

- Philosophical management framework remains the same
- Continue to build on existing good practices
- Some practices and concepts now formally recognised
- Specific numbers have changed, now radionuclide specific – need to change the spreadsheets
- Some new but limited opportunities available

Nuclear Industry Code of Practice

- CoP established a number of years ago to set out advice and best practice
- Experience with the CoP continues to be positive, widely used and adopted
- Work already underway on a New edition to reflect new Exemption Order Regime:
 - Management principles remain robust as does much of the advice
 - Specifics on legislation and numbers will have to change
 - Will include revised advice on statistics and additional advice on Fingerprints – new EOs make this more important
 - Technical author to be used to support preparation of the CoP

Summary

- Good, positive engagement with DECC and Regulators throughout the Exemption Order Review
- Industry Code of Practice Framework and approaches remain robust – specific details need to change
- Work underway to revise Code of Practice

Questions ?