How to apply for full or partial surrender of an environmental permit Part RSR-E2 – Surrendering a radioactive substances activity permit, including standard permit (sealed sources and radioactive waste)



Guidance notes

Please read these guidance notes carefully before you fill in the form..

Fill in part RSR-E2 of the form, together with parts RSR-A and RSR-F, if you are applying to surrender all or part of an existing permit for a radioactive substances activity involving sealed sources and/or radioactive waste. Surrender includes cases of stopping some or all radioactive substances activities and also reducing the size of the premises where sources are used

Once details of sealed sources are put onto part RSR-E2, the form becomes subject to national security restrictions at an 'Official – Sensitive' level.

The Environment Agency has also published additional details on radioactive substances regulation in its Radioactive Substances Guidance (RASAG) and 'How to Comply' documents.

Where you see the term 'document reference' on the form, give the document references here and send the documents with the application form when you've completed it.

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When filled in, the application form is marked 'Official – Sensitive' in accordance with the Government Security Classification Policy. The unauthorised disclosure of the information it contains could facilitate the commission of serious crime – in particular by terrorists. It is for use only by those people within your organisation who need reasonable access to it, to ensure compliance with the conditions of the permit, and trusted contacts who advise you – such as your Radiation Protection Adviser.

- Do not copy it to other parties without consulting Natural Resources Wales.
- Lock it in a secure cabinet or container when it is not in use.
- Make those who access it aware of the marking and the need to protect the information from unauthorised disclosure and loss.
- If you move it around, use a sealed envelope and do not mark the envelope 'Official Sensitive'. If you post it, use 'Royal Mail special delivery next day'.
- You should safeguard electronic copies of the data against unauthorised access. You should not email it.

1 About the permit

1a What is the permit number that this application relates to?

Tell us the reference number of the permit that you want to surrender fully or in part.

1b If your premises are on a nuclear licensed site, do not answer 1c or 1d (the tests in 1c and 1d do not apply to nuclear sites).

If your premises are not on a nuclear licensed site, do not answer 1e.

1c Describe the measures you have taken to avoid a pollution risk from sealed sources covered by the permit or part of the permit to be surrendered

Tell us how you have disposed of your radioactive sources when you have no longer needed them.

Tell us what you have done to prevent your sources from causing pollution of the premises; for example, leakage test results.

1d Describe the measures you have taken to return the premises to a satisfactory state, having regard to their state before the facility was put into operation, insofar as they are affected by the sealed sources covered by the permit or part of the permit to be surrendered.

Tell us what decontamination measures you have taken during the time the facility was in operation, which are relevant to surrender of the permit or part of the permit.

The RASAG guidance contains more details on the surrender tests.

1e How have you recorded any instances of contamination from sealed sources covered by the permit or part of the permit to be surrendered?

Tell us about your arrangements for:

- recording contamination events (including recording actions taken to remediate the situation and the results of those actions);
- maintaining those records until the site is delicensed (if you are a tenant on a nuclear licensed site, it is sufficient to confirm that you have passed the records to the licensee).
- 1f Are you applying to surrender all or part of the permit?

In order to fully surrender a permit you must have stopped all radioactive substances activities, disposed of all radioactive substances and satisfy us about the tests in questions 1c and 1d.

If you wish to reduce the size of the regulated facility, that is a partial surrender. You will need to enclose a revised plan of the site with part RSR-A.

1g If you are applying to surrender all of the permit, confirm that all sources have been removed from the premises.

Give details of what you have done with the sources (unless already described at 1b) and provide copies of documents that confirm this (for example, copies of consignment notes).

If your premises are on a nuclear licensed site and your waste sources are remaining on the site, confirm that they have been placed in a suitable waste storage facility.

2 About the partial surrender

2a Tick the relevant boxes to show which radioactive substances activities will be surrendered and which will continue

If you wish to be able to receive radioactive waste, you must have a permit to do so, even if you only intend to do this as a result of your participation in the National Arrangements for Incidents Involving Radioactivity (NAIR) or RADSAFE schemes.

You should not apply to accumulate or dispose of radioactive waste if you can do so under the terms of an exemption order.

2b Give a description of which parts of the radioactive substances activities will be surrendered and which will continue

Tell us what will be surrendered and what will remain. This may be in terms of the premises or the permits covering radioactive substances activities.

Provide a document setting out the details of the proposed partial surrender. You should use application form part RSR-C2 as a guide to structuring your document. You can use the tables directly from that form part.

Tell us:

- how the work with radioactive substances will be carried out in future;
- how you think the permit should be changed. This includes, as appropriate:
 - which of the currently permitted justified practices should appear on the permit;
 - suitable limits on sources and disposals;
 - which of the currently permitted waste types, disposal outlets and disposal routes should appear on the permit.
- **2c** Describe why you want to make these changes

Tell us why you are making the changes.

Now fill in part RSR-F of the form.