

# Application for an environmental permit

## Part RSR-C2 – Variation to a bespoke radioactive substances activity permit or standard rules permit (sealed sources)



### Please read through this part of the form and the part RSR-C2 guidance notes before you fill it in.

It will take less than two hours to fill in this part of the application form.

Fill in this part of the form, together with parts RSR-A and RSR-F, if you are applying to vary (change) the conditions or any other part of your permit, except those relating to on-site disposals of solid waste to land. If you want to vary (change) the conditions relating to on-site disposals of solid waste to land, fill in part RSR-C5.

You only need to give us details in this application for the parts of the permit that will be affected (for example, if you are adding a new radioactive substances activity or making changes to existing ones).

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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? \_\_\_\_\_

1b If you are applying for a chargeable variation and your current permit was issued under RSA 93, we will take this opportunity to update your permit to our new format and conditions (as set out in our 'How to Comply' guidance). This includes combining sealed source registrations and radioactive waste authorisations into a single permit. Please tell us if there is a particular reason why you think we should not do this

## 2 About your proposed changes

2a What type of variation are you applying for?

Administrative

Minor technical

Normal variation

Administrative variation details

- Give details in the box below then go to part RSR-F of this form
- Go to question 2b
- Go to question 2b

## 2 About your proposed changes, continued

2b Tick the relevant boxes to show which radioactive substances activities you are applying to vary

Schedule 23 Part 2 paragraph reference	Description	Add activity	Delete activity	Change activity
11(2)(a)	Keep or use radioactive material in the form of sealed sources on premises used for the purposes of an undertaking	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11(2)(b)	Dispose of radioactive waste in the form of sealed sources on or from premises used for the purposes of an undertaking	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11(2)(c)	Accumulate radioactive waste on or from premises used for the purposes of an undertaking	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11(4)(a)	Receive radioactive waste in the form of sealed sources for the purposes of disposing of them	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
11(5)(a)	Keep or use mobile radioactive apparatus in the form of sealed sources for testing, measuring or otherwise investigating any of the characteristics of substances or articles	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

2c Describe why you want to make the changes

2d Describe how and why you intend to use the sources

2e Where will you store the sources when they are not in use?

## 3 Using sealed sources on the premises

Only answer this section if you are applying for an activity described in Schedule 23, Part 2, paragraph 11(2)(a) or 11(5)(a) involving sealed sources. Do not use it for sources used for an activity described in Schedule 23, Part 2, paragraph 11(2)(a) on nuclear licensed sites if you are the site licensee. Do not use it for storage of radioactive packages in transit – go to section 5.

3a Provide the following details of sealed sources you will keep or use on the premises

Radionuclide	Number of sources	Maximum activity in each source

#### 4 High-activity sealed sources

4a Which (if any) of the sources are high-activity sealed sources (HASS)?

Radionuclide	Number of sources	Maximum activity in each source

4b Confirm whether you have read the requirements of the Defra guidance on financial and other provision for each high-activity source

No

Yes

4c Which mechanism are you proposing to use for this purpose?

You will need to send us copies of documents to enable us to judge whether your arrangements for financial provision are adequate.

4d Specify which of the following arrangements you have in place for the safe management of high-activity sources when you no longer have any use for them

Do you intend to send them to:

a manufacturer?

a supplier?

another permitted user?

a nuclear site licensee?

If none of these, describe how you intend to manage high-activity sources you no longer have any use for

4e Do you manufacture HASS?

No

Yes  Give brief details

You should tick 'Yes' even if manufacture is incidental to your main practice; for example, irradiation of cyclotron targets.

**5 Radioactive material stored in transit**

Only answer this section if you are applying for an activity which involves only short-term storage of unopened packages containing radioactive material.

5a Confirm whether you intend to store radioactive packages in transit

No

Yes

5b Provide the following information on the radioactive packages that you will store in transit, as far as you know them

Specify the following materials: cobalt-60, iridium-192, ytterbium-169, caesium-137, americium-241, molybdenum-99, iodine-125, iodine-131, others.

Radionuclide	Import, export, UK

**6 Radioactive waste sealed sources**

Only answer sections 6, 7 and 8 if you intend to accumulate or dispose of radioactive waste in the form of sealed sources and cannot do so under the provisions of the Radioactive Substances (Waste Closed Sources) Exemption Order 1963, SI 1963 No. 1831.

6a Enclose your assessment of how you plan to use the ‘best available techniques’ to minimise the period over which radioactive waste is accumulated

Document reference \_\_\_\_\_

6b Do you have an emergency role under the National Arrangements for Incidents Involving Radioactivity (NAIR) or RADS SAFE schemes?

No

Yes

6c Do you want us to include the standard conditions for organisations taking part in NAIR or RADS SAFE on this permit?

No

Yes

**7 Radioactive waste accumulation**

7a Do you plan to accumulate sealed sources that are no longer needed (waste sealed sources)?

Answer ‘No’ if you accumulate or dispose of waste sealed sources under an exemption order without a permit from us (you are responsible for keeping to the conditions of any exemption order you use).

Answer ‘Yes’ if you accumulate sealed sources but are unable to use an exemption order.

Yes  Now answer questions 7b, 7c and 7d

No  Go to section 8.

7b Explain why your accumulation of waste sealed sources is not carried out under an exemption order

## 7 Radioactive waste accumulation, continued

7c Provide the following details of waste sealed sources you plan to accumulate

Radionuclide	Maximum activity	Maximum number of sources to be accumulated	Maximum time you will accumulate it for	Is the source a HASS, similar potential hazard or category 5 (state which)?

7d Why are you suggesting these time periods for accumulating waste sealed sources?

## 8 Disposal of waste sealed sources

8a How do you plan to dispose of waste sealed sources?

Document reference

8b Provide the following details of waste sealed sources you plan to dispose of

Radionuclide	Maximum activity	Maximum number of sources to be disposed of	Is the source a HASS, similar potential hazard or category 5 (state which)?

8c Confirm whether you have contracts in place for another organisation to receive all of your waste

No

Yes

## 9 Receipt of waste sealed sources

9a Provide details of the origin, nature and quantity of waste sealed sources to be accepted onto the premises, and how you will manage and dispose of them

Do not answer this question if the only radioactive waste that you will receive from elsewhere is that which may arise as a result of your participation in NAIR or RADSAFE.

Document reference

## 10 Security of sources

Do not use this section for sources used for an activity described in Schedule 23, Part 2, paragraph 11(2)(a) on a nuclear licensed site.

**10a** Provide the following details of all the sealed sources (kept or used, in mobile radioactive apparatus or waste) that you will have at any time, excluding category 5 and exempt sources

Building or facility name or number	Radionuclides and practices*	Maximum total activity of each radionuclide	Source category (1 to 4)	Security level (A to C)

\* Note: practices and categories are as specified in the Security Requirements Document in question 10b.

**10b** Do you have a copy of the Security Requirements Document, ‘Security Requirements for Radioactive Sources’, NaCTSO, April 2011?

This is available from your local police Counter-Terrorism Security Adviser.

No

Yes

**10c** If you think your premises are in security levels A, B or C, have you met all of the conditions of the Security Requirements Document for the security level your premises are in?

No

Yes

Now fill in part RSR-F.

## 11 How to contact us

If you need help filling in this form, please contact the person who sent it to you or contact us as shown below.

Phone: 0300 065 3000

Email: [RSRpermitting@naturalresourceswales.gov.uk](mailto:RSRpermitting@naturalresourceswales.gov.uk)

Website: [www.naturalresourceswales.gov.uk](http://www.naturalresourceswales.gov.uk)

## Feedback

(You don’t have to answer this part of the form, but it will help us improve our forms if you do.)

We want to make our forms easy to fill in and our guidance notes easy to understand. Please use the space below to give us any comments about this form or the guidance notes that came with it.

How long did it take you to fill in this form? \_\_\_\_\_

We will use your feedback to improve our forms and guidance and to tell the Government how regulations could be made simpler.

**Please tell us if you need information in a different language or format (for example, in large print) so we can keep in touch with you more easily**