Transposition of RPE & RPO requirements of 2013/59/EURTAOM in the UK

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Overview

• Summary of current arrangements in UK
• Arrangements for transposition of the BSSD in the UK
• Specific issues relating to RPE and RPO
• Requested points for discussion
Current Arrangements: Legislation

- No single, “stand alone” piece of legislation covering all aspects of radiation protection in the UK.
- Requirements of 96/29/EURATOM was implemented via multiple sets of regulation
  - a desire for zero duplication
- UK legislation falls into 3 broad categories
  - Protection of persons
  - Control of radioactive substances
  - Advisory Functions

A “goal setting” approach is adopted in the UK
Protection of Persons

- Health & Safety at Work Act 1974
- Management of Health & Safety at Work Regulations 1999
- Ionising Radiations Regulations 1999
- Nuclear Installations Act 1965
- REPPIR 2001
- Ionising Radiation (Medical Exposure) Regulations 2010
- Justification of Practices Regulations 2004

Protection of the Environment

- Radiological Protection Act 1970
- Health Protection Agency Act 2004
- Health & Social Care Act 2012

Advisory Functions

- Environmental Permitting Regulations 2010
- Radioactive Substances Act 1993
- HASS & Orphans Sources Regulations 2005
- Transport Legislation

Listen to good advice and you will thrive
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Current arrangements: Transposition of “QE” (1)

*Radiation Protection Advisor (RPA)*

- A requirement of Ionising Radiation Regulation 1999
- Addresses *occupational exposure*

**Definition**

- “.. An individual who, or a body which, meets such criteria of competence, as may from time to time be specified in writing by the <regulator>”

- Employers required to consult “suitable” RPAs as necessary for the observance/compliance with IRR99 - for some specific aspects there must be evidence of dialogue.
RPA Recognition

- An assessing body has been established by the Regulator (RPA2000)
  - Deals with administrative process
  - Pool of assessors
- Prospective RPEs required to submit portfolio of evidence to RPA 2000 that demonstrates that they meet the Regulators requirements for core competence.
  - Knowledge and understanding of the “basic syllabus”
  - A detailed understanding of IRR99
  - Knowledge of operational radiation protection methods
  - Ability to provide adequate advice
RPA Recognition (ctd)

- Not dependant on attendance on any specified training courses or events
  - But there are appropriate courses etc
- Not application or sector specific
  - “suitability” of RPE is for the employer to determine
- Valid for 5 years
  - Evidence required for retention of recognised status.
- Organisations can be recognised on a corporate level; these are known as “RPA Bodies”
Current arrangements: Transposition of “QE” (2)

Radioactive Waste Advisor (RWA)

• A requirement of EPR 2010
  • required by those holding permits to accumulate and/or dispose of radioactive waste.

• Definition
  • “.. A specialist in radioactive waste disposal and environmental radiation protection who has demonstrated competence in the RWA syllabus..”

• Employers required to consult with a suitable RWA on a number of specified issues.

• Recognition arrangements similar to those for RPA.
Current arrangements : “RPO”

Not a concept in 96/29/EURATOM, but …

“Radiation Protection Supervisor” (RPS)

• Requirement of IRR99 (occupational exposure)
• “..for the purpose of securing compliance with regulations..”
• Employer appointment
• RPSs required to receive “appropriate” training
  - should reflect the work undertaken

“competent persons”

• Requirement of Environmental Permits (EPR2010)
  • But a general term, no prescribed responsibilities
Transposition of the BSSD in the UK

• Cross government project with all relevant Agencies & Authorities involved.

• Impact, risks and cross-cutting issues identified

• Required revisions to legislation (“new” regulations) by February 2018 – but not before.
Requirement for RPE/RPO

Transposition issues being lead by HSE (occ.) but acknowledgement it is a cross-cutting issue.

**RPE** : No significant issues for implementation foreseen
- Work on going to rationalise current recognition schemes
- “RPA” and “RWA” will continue
- RPA Body concept to be retained.

**RPO** : No significant issues foreseen
- Current model maintained
- May be some minor variation?
Suggested Key Points for Discussion

1. How is professional competence (RPE) demonstrated?
   - what is an assessor looking for?
   - criteria for competence?

2. Boundaries on flexibility of approach to
   - development and recognition of RPEs on a national basis.
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