



Public Health  
England

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

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*(HERCA Task Force on E&T  
ENTRAP III, WP6 &7)*

# 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*



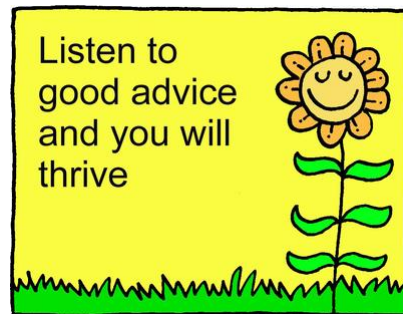
## Protection of Persons

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

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



## Protection of the Environment



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

## Advisory Functions



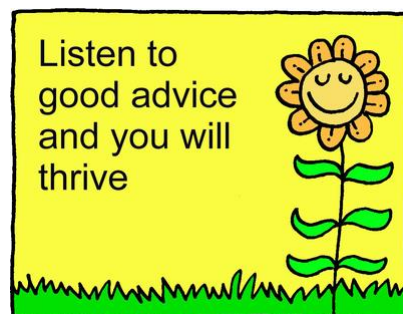
## Protection of Persons

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## Protection of the Environment



## Advisory Functions

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

# 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 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 know 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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