

FOD Quality System

Inspecting: Site Radiography Notifications

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Procedure

- Purpose
- Scope
- Policy
- Training

PURPOSE

The purpose of this procedure is to document a process that will:

- ensure a consistent approach to handling site radiography notifications;
- provide improved information about the activities of site radiography contractors nationally;
- facilitate the planning and targeting of inspection work;
- ensure a uniform approach to the processing of requests for waivers.

SCOPE

The procedure applies to the handling of all site radiography notifications and waiver requests. It does not cover:

- the target numbers of annual inspections planned to be made to radiography companies;
- regulatory decision taking by inspectors undertaking site radiography inspections.

POLICY

It is FOD policy to:

- process notifications and requests for waivers in a timely and consistent

manner;

- record all site radiography notifications and waiver requests received.

TRAINING

Line managers must arrange training for staff new to this work using the material maintained by the Procedure Owner and ensure staff are competent in their operation of this procedure.

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Action by East Grinstead Specialist Support Team Staff

- Action on Receipt of Notifications
- Incomplete Notifications
- Complete Notifications
- Record Keeping
- Action on Receipt of Waiver Requests
- Site Radiography Client Database
- Central Record of IRR'99 Reg 6(3) Notices

ACTION BY EAST GRINSTEAD STAFF ON RECEIPT OF NOTIFICATIONS

The notification must be checked to ensure that:

- the contractor is on the current list of site radiography contractors (maintained by ESESG East Grinstead) listing all known site radiography contractors. The list also records which clients have been issued with formal notices under IRR'99 Reg 6(3) & 6(4);
- the information provided on the notification is complete. This must include all the required particulars listed in the IRR'99 Reg 6(3) notices sent out to site radiography contractors.

INCOMPLETE NOTIFICATIONS

If a notification is incomplete or incorrect it should not be accepted. The site radiography contractor must be contacted by e-mail, using a standard e-mail proforma or by return fax and asked to provide the information.

Notifications made by phone must not be accepted.

COMPLETE NOTIFICATIONS

Complete notifications must be assigned a unique work sheet number and forwarded by e-mail (tagged with the 'return receipt' message delivery option) to the relevant Specialist Inspector

(Radiation) in whose area the work is to take place.

Notifications for site radiography work to be carried out offshore must be passed to Offshore Safety Division. A list of contact details for Offshore Safety Division is held by ESESG.

RECORD KEEPING

All notifications should be stored for a period of one year.

All notification details irrespective of the method of delivery to ESESG must be logged on the site radiography spreadsheet within 10 days of receipt of the notification.

Details of any FOCUS contact numbers and enforcement action must be added to the site radiography spreadsheet (against the relevant notification) within 10 days of receipt from the Inspector.

ACTION BY EAST GRINSTEAD STAFF ON RECEIPT OF WAIVER REQUESTS

Requests for waivers must be passed by telephone to the relevant Specialist Inspector (Radiation) immediately. Should that person not be available the next available Specialist Inspector (Radiation) should be contacted. That person will either deal with the waiver themselves or issue instructions for it to be dealt with in some other way. Details of the request for the waiver and which inspector dealt with it must be recorded on the site radiography spreadsheet within 24 hours of receipt.

A record must be completed on the site radiography spreadsheet, of the inspectors decision to accept or reject the request within 48 hours of receipt from the inspector. This decision must be recorded.

SITE RADIOGRAPHY CLIENT DATABASE

ESESG will update the site radiography contractors database with details of new IRR'99 Reg 6(3) notices received from Inspectors within 14 days of receipt.

CENTRAL RECORD OF IRR'99 REG 6(3) NOTICES

ESESG will maintain copies of all Reg 6(3) notices and covering letters issued to site radiography contractors. This will include original (or where these are not available copies of) Royal Mail Recorded Delivery receipts.

Within 28-days of receipt of recorded delivery receipts ESESG will use the Royal mail 'track and trace' service, using the internet, to check receipt of the notices. Copies of the 'track and trace' report will be attached to the copy Reg 6(3) notice and letter.

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Initial Receipt of Site Radiography Notifications at HSE Offices other than East Grinstead

- Action by Administrative staff
- Notifications under (IRR'99) Reg 6 (2) and 6(5) from Industrial and Site Radiography contractors
- Notifications under (IRR'99) Reg 6 (2) and 6(5) which DO NOT Relate to Industrial or Site Radiography

ACTION BY ADMINISTRATIVE STAFF

Within 4 hours of receipt a new notification or waiver request for site radiography work received direct from a site radiography contractor, by an HSE office other than East Grinstead, must be sent by fax (VPN 503 4257) or e:mail (siteradnot@hse.gsi.gov.uk) to FOD East And South East Division Specialist Group (ESESG). ESESG admin. staff must also be advised by telephone (VPN 503 4263).

The notifier must be contacted, within 4 hours of receipt, and informed that the notification was sent to the wrong office and that it is being redirected.

DEALING WITH NOTIFICATIONS UNDER (IRR'99) REG 6(2) AND 6(5) FROM INDUSTRIAL AND SITE RADIOGRAPHY CONTRACTORS

3 Notifications from site radiography contractors relating to the use of ionising radiations for the first time (IRR'99 Reg 6(2) notifications) or information about changes to notifications made under Reg 6(2) – (IRR'99 Reg 6(5) notifications) which relate to either 'industrial radiography' or 'site radiography' must be forwarded to the local Specialist Inspector (Radiation). These notifications SHOULD NOT be sent to ESESG.

NOTIFICATIONS UNDER (IRR'99) REG 6(2) AND 6(5) WHICH DO NOT RELATE TO INDUSTRIAL OR SITE RADIOGRAPHY

4 Staff should not direct IRR'99 Reg 6(2) and 6(5) notifications which relate to other uses of ionising radiation to ESESG, they should be directed to the relevant FMU's Principal Inspector or

otherwise distributed in accordance with local/divisional arrangements. This may include copying the notification to the local Specialist Inspector (Radiation).

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Action by Specialist Inspector (Radiation)

- Notifications under IRR'99 Reg 6(2) and 6(5) from Industrial and Site Radiography Contractors.
- Authority to Grant Waivers under IRR'99 Reg 6(3) and 6(4)
- Action by Specialist Inspectors on Receipt of Waiver Requests
- Action by FOD Band 3 Inspectors

NOTIFICATIONS UNDER IRR'99 REG 6(2) AND 6(5) FROM INDUSTRIAL AND SITE RADIOGRAPHY CONTRACTORS

On receipt of the notification the Local Specialist Inspector (Radiation) must arrange as necessary to:

- issue, by recorded delivery, a formal notice to the site radiography contractor under Regulation 6(3) IRR'99 (see OC 560/53 paragraphs 19 to 24);
- advise ESESG, East Grinstead, of a new employer or any changes to existing contractor details (to enable the site radiography client database to be updated);
- send the original site radiography contractors notification (ie to HSE) and a copy of the Reg 6(3) notice together with the original recorded delivery receipt to ESESG East Grinstead;
- arrange for a copy the Reg 6(3) notice together with the original contractors notification to be placed on FOCUS filing. Copies must also be sent to the Principle Inspector of the relevant FOD FMU.

AUTHORITY TO GRANT WAIVERS UNDER IRR'99 REG 6(3) AND 6(4)

Authority to grant waivers under IRR'99 Reg 6(3) and 6(4) has been delegated to FOD Band 2 & 3 Specialist Inspectors (Radiation) and FOD Band 2 Inspectors only.

FOD Operational Band 3 Inspectors do not have the authority to grant waivers.

FOD Band 2 & 3 Specialist Inspectors (Radiation) have the lead on dealing with waiver requests. FOD Health Unit, Edinburgh, retains copies the original FOD 'delegated authority' documents.

Band 2 Operations inspectors should only issue waivers in the exceptional circumstances (ie to cover illness/other absence) where no FOD Band 2/3 Specialist Inspector (Radiation) is available nationally.

ACTION BY SPECIALIST INSPECTORS ON RECEIPT OF WAIVER REQUESTS

Specialist Inspectors (Radiation) must inform ESESG by e-mail within 24 hours (of their receipt of the waiver request) of their decision to grant or reject the waiver.

ACTION BY FOD B3 INSPECTORS

If an inspection of the notified work is undertaken, details of the FOCUS contact number and any enforcement action or investigations raised against the notification must be sent by e-mail to the ESESG team within 10 days of inputting the relevant FOCUS entries.