

Title	Radioactive Substances Regulation		
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1.0 Introduction

1.1 The purpose of this notice is to bring to your attention the environmental regulatory framework governing radioactive substances in the UK, namely:

- [The Radioactive Substances Act 1993 Amendment \(Scotland\) Regulations 2011](#), enforced by the Scottish Environment Protection Agency (SEPA).
- [The Environmental Permitting \(England and Wales\) Regulations 2016](#) (EPR16), enforced by the Environment Agency (EA).

And also to highlight;

- [The High-activity Sealed Radioactive Sources and Orphan Sources Regulations 2005](#), and;
- [The Carriage of Dangerous Goods \(Road, Rail, Sea and Air\)](#)

(n.b. In Northern Ireland the Northern Ireland Environment Agency enforces RSA93 and in Wales National Resources Wales enforces EPR16).

1.2 This notice also differentiates the environmental regulatory requirements from those under the Ionising Radiations Regulations 1999 (IRR99) enforced by the Health and Safety Executive (HSE).

1.3 This revision updates the legislative requirements and replaces Operations Notice 4 issued in January 2002, which is now withdrawn.

2.0 Background

2.1 In the course of exploration, exploitation, construction and production specialist contractors use a variety of sealed and unsealed radioactive sources. Sources may be used during grouting, cementing, reservoir and vessel tracing studies, NDT and downhole operations. Installed fixed measurement equipment known more commonly as 'nucleonic instruments' are used in a number of applications including level measurement, density measurement and phase measurement. Production of Oil and Gas may give rise to the accumulation of Naturally Occurring Radioactive Material (NORM) in process equipment, the presence and concentration of NORM varies between areas and installations.

2.2 Such work is subject to IRR99 which HSE enforces and which imposes comprehensive duties on employers and the self-employed to protect people at work against exposure to ionising radiations (IR).

2.3 It should be borne in mind that duties under IRR99 include requirements for notifying HSE in advance of work with IR; for a system of accounting for radioactive substances in suitable receptacles and stores; for notification to HSE of certain releases; and losses of radioactive substances. The requirements of RSA93/EPR16 are in addition to and separate from IRR99.

3.0 RSA93 / WPR16

3.1 When there are any radioactive substances on board an offshore installation, an activity connected with offshore installations, pipeline work and activities in connection with pipelines they are also subject to RSA93/EPR16 (depending on the geographical location). EPR16 consolidates earlier amendments to EPR10, any permits issued under EPR10 continue in force as do certificates made under RSA93 prior to EPR2010.

3.2 Similarly, EPR16 requires that the keeping and use of radioactive material and the disposal and accumulation of radioactive waste is authorised by an environmental permit. Environmental permits are specific to the premises and the nature of radioactive material/waste i.e. fixed/mobile sources and liquid/solid waste. Conditions and limitations may be attached to permits.

3.3 Before commencing work with radioactive substances, firms in Scotland should ensure that an application for registration and/or authorisation is made to SEPA:
www.sepa.org.uk/regulations/radioactive-substances
www.sepa.org.uk/regulations/authorisations-and-permits/application-forms

In England an application for a permit must be made to EA:
www.gov.uk/government/collections/radioactive-substances-regulation-for-non-nuclear-sites

3.4 Applications should be made as early as possible, once an application has been accepted a certificate or permit will be issued. Valid certificates/permits must be in place for all work, for example if a specialist contractor brings radioactive source onto your premises then they must have the appropriate permissions.

3.5 Guidance on exemptions from the full auspices of RSA93/EPR16 can be found in the document "[Guidance on the scope of and exemptions from the radioactive substances legislation in the UK](#)"

3.6 Sources that cannot be recovered from downhole must be notified to EA/SEPA as appropriate.

4.0 HASS

4.1 High Activity Sealed Sources (HASS) are above certain threshold activities defined in the regulations. Additional security requirements apply to the keeping and use of HASS sources. In England and Wales the HASS regulations have been consolidated into the environmental permitting regulations. Conditions are specified in the certificate of registration or environmental permit.

5.0 Transport of radioactive sources

5.1 Radioactive material is Dangerous Goods Class 7 for transport; consideration must be given to the controls needed and requirements of the mode(s) of transport when consigning radioactive substances.

Offshore Safety Directive Regulator



5.2 This guidance is issued by the Offshore Safety Directive Regulator (OSDR). Following the guidance is not compulsory and you are free to take other action. But if you do follow the guidance you will normally be doing enough to comply with the law. Health and safety inspectors seek to secure compliance with the law and may refer to this guidance as illustrating good practice