

HSE Guidance on Site Radiography Waivers – V1 – April 2020

Regulation 7 of the Ionising Radiation Regulations 2017 (IRR17) requires employers who carry out industrial radiography to gain consent from the HSE. Once granted that consent is subject to conditions one of which is that-

no site radiography will take place without the consent holder receiving at least seven days' written notice from the client commissioning the site radiography work on each and every occasion the work is carried out, or written HSE agreement to waive this requirement

Employers must therefore have at least 7 days' notice in writing from their client before carrying out site radiography. Where work continues at one site with no significant change, one notification, covering a period not exceeding one calendar month, from the client to the radiography employer for a series of radiography operations is acceptable. There is no requirement under this condition to send the written notice to HSE.

However, employers can apply to the HSE to have the 7 day notice in writing condition waived.

There are three types of waiver requests:

- (i) Applications concerning embedded work
- (ii) Applications over a given time period for periodic work.
- (iii) Applications in emergency situations.

Embedded work is when the site radiography company has a permanent presence on their client's site. The radioactive sources and/or radiation generators are stored at their clients site when not in use, or transported there on a daily basis. The radiography company will normally have an office or other premises on their client's sites which they use as a base and from which they operate. Waivers of this nature can be granted for a period of up to one year, but no longer, and if required may be renewed upon application once this period expires.

Periodic waivers are for when site radiography companies are called upon to carry out site radiography periodically at the same client's site over a given time period. The nature of their client's work means that they cannot be specific about the date and time the site radiography will be required, or how often, but they do know that it will be required over a given time period. They have given written notice of this work to the site radiography company and the latter subsequently applies to the HSE to have the 7-day consent condition waived as they cannot be certain when they will be required to carry out the work. Waivers of this nature can be granted for a period of up to 3 months. Typical frequency of site radiography work for this type of waiver would be at least 10 different occasions during that 3 month period (or an equivalent frequency if the waiver is for a shorter period).

Emergency waivers are for cases of an emergency where a site radiography company may be called upon to carry out work without 7 days' written notice being given by their client. An example of an emergency is when site radiography is necessary in order to maintain, or minimise the loss of, an essential energy supply. In these cases the site radiography company will apply to the HSE to have the 7-day consent condition waived due to the short notice.