L2 Newsletter

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L2 BUSINESS CONSULTING

Merry Christmas and a Happy 2011

Welcome

This is our third newsletter aimed at our customers and other stakeholders with an interest in our activities. We have adopted a slightly different format incorporating information on our capabilities, nuclear news and our RPA Newsletter for our customers who are users of ionising radiations. We hope you find it useful and welcome any feedback you would like to make.

It has been an exciting time in the nuclear sector over the last months as the new UK Government moves forward with the UK plans for new nuclear power including the restatement on the draft National Policy Statements (NPS) for 8 identified possible sites in the first wave. The NPS lists the sites that the Government has judged to be potentially suitable for the deployment of new nuclear power stations by the end of 2025 and the reasons why those sites are considered potentially suitable.

Against this background the three new nuclear build utilities EDF Energy, Horizon Nuclear Power and the new consortium of Iberdrola/GDF Suez and SSE, who announced their new branding as NuGeneration Limited earlier this month. All of the teams continue with their plans for development of new nuclear power stations at their respective sites. The government along with the NPS, issued the regulatory justification of the AP1000 and EPR reactor designs. We can expect the new financing of nuclear decommissioning and waste handling regulations to be issued imminently along with revised draft guidance on Funded Decommissioning Plans (FDP).

Within the UK decommissioning and clean-up market, the positive news is that the Nuclear Decommissioning Authority (NDA) has been awarded during the governments Comprehensive Spending Review (CSR) in late October 2010 £8.6 billion for the next four years of activities in addition to its own income from commercial operations; this represents a significant increase from its previous funding from government. It is expected that this additional funding will be focused on the high priority hazards at Sellafield. Also in the last few months the NDA has commenced the competitive dialogue with the two teams bidding to become the new Parent Body Organisation (PBO) responsible for the Dounreay site.

Within the industrial users of ionising radiations our RPA News section includes updates from the key regulators on The Ionising Radiations Regulations 1999, Radioactive Substances Act 1993, Carriage of Dangerous Goods & Transportable Pressure Vessels Regulations 2009 and other related national/international standards and guidance. It also contains updates on recent incidents and the relevant lessons learnt. This section also contains advice on applications under the new Environmental Permitting regulations which have replaced RSA93 in England and Wales.

Finally we would like to extend Christmas greetings to all of our customers and stakeholders, we hope you have an enjoyable holiday with your families and look forward to working with you in 2011.

L2 Services

L2 Business Consulting are an independent consultancy providing strategic advice on waste management, clean-up, regulatory and business development within nuclear and other highly regulated industries. We are a provider consultancy services across the nuclear fuel cycle including advice on waste management and decommissioning for both clean-up and new nuclear build sectors. We also undertake regulatory support covering licensing, permitting, compliance, radiation protection, health & safety, environmental, quality assurance and training.

Our two technical practice areas are underpinned by the business development group who provide customers with advice and support in strategic company development in the nuclear sector covering capture management, strategy development, market intelligence.

One of the unique aspects of our offering is that our consultants have been both operators and contractors at a range of nuclear licensed facilities throughout the UK involving the full range of regulators and stakeholders. Our consultancy advice to customers is based on decades of real implementation experience not just the theory.

Overall our goal is to support customers in delivering significant capital programmes, typically in high hazard environments against a highly regulated environment, where we can add value by helping to achieve regulatory compliance and safe operations. Below we have focused further on some of our capabilities in more detail:

Permitting and Licensing

Our consultants led the nuclear site licensing and permitting of the first company to obtain a nuclear license in the UK for over 20 years at a waste processing site in Cumbria. Our consultants have supported from planning, design through to licensing support a number of UK nuclear facilities including nuclear power plants, nuclear chemical plants and a range of decommissioning/waste management facilities. We can help your organisation to understand, interpret and implement the requirements imposed by legislation, planners and regulators whilst recognizing the importance of stakeholder consultation in these activities.

We also team with other consultancies to provide the licensing and permitting activities governed under non nuclear legislation such as PPC, Planning, Habitat Surveys and EIA.

Assurance Services

We offer assurance, health, safety and environmental support to the UK nuclear and other high regulated industries. We have a team of RPA's and Health Physicists who can provide practical advice on the use and protection from ionising radiations both from a nuclear industry and industrial applications.

We also have extensive experience in EPR10/RSA93 authorisations, Nuclear Site Licence compliance support including production of construction and commissioning documentation within framework of nuclear site licence, safety & environmental management prospectus, permitting requirements and management systems.

We have consultants who are experienced Dangerous Goods Safety Advisors (DGSA) for class 7 transports helping you with your transportation, packaging and logistics issues.

For prospective nuclear site licensees we can support you with Organisational Development and Management System Development to meet requirements of nuclear site licensee and are familiar with the nuclear QA requirements such as ASME NQA-1 and IAEA GS-R-3.

Oue team are also experienced in developing safety documents that meet requirements of NGN1-3, NII SAP's, NII TAG/TIG's, EA REP's and OCNS Construction Security guidelines.

Radioactive Waste Management

Our team has extensive support in assisting customers in developing workable solutions to meet current and future radioactive waste management requirements and are able to offer comprehensive support to ensure you effectively manage your liabilities from identification, sampling, characterisation, optioneering to select and demonstrate Best Available Technology to proposed recovery, treatment, packaging, storage and disposal schemes.

We are independent of waste treatment and disposal operators and are therefore uniquely placed to support your selection and undertake lifecycle costs analysis to support commercial decisions and allow the undertaking of robust BPEO, BPM and BAT studies.

Our consultancy services help customers interpret and implement UK and international radioactive waste policies. Our comprehensive understanding of the issues are based on our consultants decades of real experience in supporting government, NDA, site licensees, main contractors and consultants.

Ionising Radiations Regulations 1999

Basic Safety Standards

A draft of the new Euratom Basic Safety Standards Directive, which forms the basis of ionising radiations regulations, has been published for information only and is currently undergoing internal Commission processes before being issued for consultation. The UK Government Stakeholder Working Groups are now prepared for eventual negotiation of the revised Directive. The timetable for this is still uncertain.

Notifications

Under IRR regulation 6(2) employers must notify HSE 28 days before they undertake work with ionising radiations for the first time. Under regulation 6(3) and 6(4) of IRR, HSE has served a notice on individual radiography companies to require notification of every site radiography job they undertake, at least seven days beforehand. This is intended as an aid to contractors in planning and controlling their site radiography work. It also helps HSE to plan inspection activities.

The Health and Safety Executive (HSE) has revised its guidance dealing with Offshore Aspects of Ionising Radiations (reference SPC/ENF/151) and updated Operations Notice 34 which deals with notification of offshore site radiography work.

The Guidance explains that offshore notifications are not a special case and that the Regulations make no distinction between onshore and offshore. The HSE have given clear guidance on what to notify, exemptions, material changes and site radiography on their website and this was updated in June 2009. HSE also have an Infoline (08453450055) where all enquiries are treated in confidence.

Specific offshore radiography notification guidance is given in Operations Notice 34 (available on HSE website). This Notice describes the arrangements for notification of offshore site radiography. They are similar to those for onshore work. The Notice also indicates the circumstances under which one notification for a series of radiography operations is acceptable ie blanket notifications, and the procedures for notifying unforeseen and emergency work.

Site radiography notifications are most commonly sent using Form IRR3 by email to HSE's East Grinstead office. Here it is sent to the relevant Offshore focal point inspector and admin who then send it to the Offshore Inspection Management Team for the installation.

Inspections can then be carried out which can be general and/or themed. The inspections can also look at:

- Presence of suitable RPS's
- Existence of suitable Local Rules & evidence of application
- Storage facilities
- Access & lighting
- Maintenance of equipment (including dosemeters and emergency equipment)
- Use of TLDs & storage & exchange arrangements
- Integration of radiography operations with installation procedures
- Use of dosemeters before, during & after exposures
- Ability to calculate exposure times
- Use of correctly sized, demarcated and patrolled Controlled Areas
- Use of distance, time & shielding to minimise personal exposures
- Knowledge of emergency procedures for both radiography & the installation generally

Onshore inspections are very similar and can involve the client of the radiography contractor. Typically both onshore and offshore inspections can encompass:

- Client policy for policy for non-destructive testing, including criteria for selection between alternative techniques, and assessment of relative risks
- Client planning procedures, for both routine and unexpected radiography
- Client selection of contractors, including arrangements for work at short notice
- Client training of workforce and management
- Client arrangements for monitoring of standards, and where appropriate for audit of contractors

- Client emergency procedures, including liaison with the radiography contractor
- Contractor work planning procedures, including risk assessment, and selection and rehearsals of operating methods and equipment
- Appointment, training and assessment of radiographers and supervisors
- Appointment of a radiation protection adviser, extent of use made of their services, and action taken as a result
- Preparation of local rules, including adaptation to suit individual situations
- Systems for dose measurement and recording, including handling of TLDs
- Liaison arrangements with customers for job planning, and with HSE for notification, including comparison of notification records with work actually performed
- Arrangements for transport of sources
- Maintenance systems
- Arrangements for supervision of offshore work
- Emergency procedures, including means of obtaining back-up from external sources
- Incident investigation procedures

Reports of radiation incidents or overdoses require prompt investigation. If there is reason to believe a person's health may be at risk, the HSE should be consulted (Occupational Health Team and specialist radiation inspector). It should be noted that RIDDOR may be applicable.

Notification is an important part of HSE's enforcement strategy and work planning. HSE want to maintain a high standard of notification and to reduce radiation doses to site radiographers. Enforcement action will be considered against offenders in appropriate cases.

Transport

The DfT Compliance Inspection Programme of industrial users of radioactive materials is continuing with its risk based inspection programme. Findings so far have been good but there is room for improvement. DfT have issued the results of the findings and are encouraging companies to check their own arrangements to identify improvements. The key information areas are:

- Consignment documentation - not all of the required information is included
- Package Approval - no evidence that the package meets the requirements of the transport regulations
- Instrument Calibration - devices such as radiation monitors out of calibration
- Package Marking - incorrect or insufficient marking
- Package Labelling - torn and illegible labels
- Transport Security - lack of training and awareness of potential transport security issues
- Emergency Arrangements - lack of preparedness and testing
- DGSA - most organisations don't have one. HSE have firmly stated (and on their website) that transport more than about twice per month needs a DGSA
- Equipment in the Vehicle - lack of fire extinguishers and other kit
- Radiation Protection Programme - some form of programme usually exists but it is not managed as such and subjected to periodic written reviews and actions

A detailed Quality and Compliance Assurance questionnaire is currently being piloted requesting details of the Quality Assurance Programme used by duty holders for the transport of radioactive materials. Completed questionnaires will be assessed as part of the DfT compliance assessment programme. The QA System Audit Programme for 2010/12 is under review.

Regulatory Guidance Material is under development and will be interactive covering:

- Transport documentation
- Marking and labelling of packages
- Schedule of requirements

The user will be given information about each entry on the transport document and where in ADR the requirement is cited for each UN number. Similarly the marking and labelling requirements will be shown for each UN number whilst the schedule will outline the requirements for content limits, the package type, marking and labelling, emergency arrangements, documentation, driver training, fire extinguishers, other equipment etc.

The Radioactive Material Transport team now has some dedicated emergency telephone numbers. Incorporate these in your Emergency Arrangements. In accordance with CDG regulation 24(2), Schedule 2 the carrier and consignor must immediately notify DfT of the occurrence of a notifiable event using in the first instance the following numbers:

- DAY - 020 7944 5749
- NIGHT - 020 7944 5999
- SWITCHBOARD – 020 7944 8300

Radioactive Substances Act 1993 / Environmental Permitting (England and Wales) Regulations 2010

Overview

The Environmental Permitting (England and Wales) Regulations 2010 (EPR10) were approved by Parliament and the National Assembly for Wales and came into force on 6 April 2010. Environmental Permitting is one of Defra's Better Regulation initiatives which aim to improve regulatory activities, cut administration burdens and focus on the delivery of a better service to customers. There will be no change of scope or standards.

The introduction of the new Regulations has changed the legal basis for much of radioactive substances regulation in England and Wales. Although operationally there is perceived to be minimal change, there are significant changes in terms of documentation and how the compliance is monitored and regulated both in the nuclear and non-nuclear sectors.

The Environmental Permitting system simplifies permit applications, amendments and variations for both industry and regulator and thereby cuts unnecessary red tape. It allows regulators to focus resources on medium and high-risk operations whilst continuing to protect the environment and human health. EPR10 provides industry, regulators and others with a single extended permitting and compliance system and includes those systems for radioactive substances regulation.

Currently held Registrations and Authorisations will not be required to be renewed but will be replaced if and when users implement changes. There are now 8 permit variations instead of 17. The minor variation concept has disappeared, but the concept of minor technical change has been retained.

A single permit for all radioactive sources is not possible because of security issues with sealed sources. There will need to be two separate permits for sealed and unsealed. All sealed source permits will be marked "Restricted" to satisfy security requirements. Users will be expected to protect information marked in this way. The sealed sources applications are not allowed to go on the public register. The public will be allowed 30 days to respond to applications that will be announced on the website. The EA will consider all comments.

New Application Form

All applications for a new permit or to vary or transfer or surrender an existing Certificate of Registration (including a Mobile one) and/or Authorisation to Accumulate and Dispose made after 6 April 2010 must be made using the new single form which is made up of six (A to F) parts as shown opposite. Where mobile sources are concerned, under the new scheme they will be registered under sealed sources and will not have a separate form.

EA have stated that the forms will be available as a PDF file that can be completed and saved. All applications require Part A and F plus other appropriate forms from the list. Forms should be available on the web but if not yet then interim forms will be available.

For the non-nuclear sector new applications will take a maximum of 4 months to process whereas variations will take 3 months. Applications will still be assessed locally except for Standards Rules permits (fixed condition registrations for small hazard sources) which will be administered centrally from Sheffield.

RPA News (continued)

FORM PART	USE
RSR-A You & Your Premises	For all applications – new permit, variation, transfer or surrender
RSR-B1 Standard Facility ie Standard Rules Permit	**When:** • you don't already have a permit relating to sealed sources • you want to keep or use sealed sources on a premises • each source and all sources taken together fall within Source Category 5 ie lowest risk to health & the environment
RSR-B2 Bespoke permit – sealed sources	**When:** • you don't already have a permit relating to sealed sources; and • you want to do one or more of: • keep or use Category 1-4 sealed sources on a premises • keep or use mobile radioactive apparatus in the form of sealed sources (any Category) • receive, accumulate and/or dispose of waste sealed sources (any Category)
RSR-B3 Bespoke permit – Nuclear Site, open sources & waste	**When:** • you don't already have a permit relating to open sources or radioactive waste but want to do one or more of: • keep or use open sources on the site • receive or dispose of waste on or from the site • keep or use mobile radioactive apparatus in the form of open sources
RSR-B4 Bespoke permit - Non-nuclear site, open sources & waste	**When:** • you don't already have a permit & you are not on a nuclear licensed site but want to do one or more of: • keep or use open sources on the site • receive, accumulate or dispose of waste on or from the site • keep or use mobile radioactive apparatus in the form of open sources
RSR-B5 Bespoke permit – on-site disposal of solid waste to land	**When:** • you don't already have a permit relating to open sources or radioactive waste; and • you want to dispose of solid, low level waste to land on your premises
RSR-C2 Variation – sealed sources	**When:** • you have a permit relating to sealed sources; and • you want to make changes to it such as: • altering the permitted number of sources held • changing from a bespoke to a standard facility permit or vice-versa • adding or deleting a radioactive substances activity eg disposal of waste sealed sources
RSR-C3 Variation – Nuclear Site - open sources & waste	For making changes to your permit eg types of activities, waste routes
RSR-C4 Variation – Non-nuclear site - open sources & waste	As above
RSR-C5 Variation – on-site disposal of solid waste to land	For changes eg add on-site as a new route or changes to existing conditions

FORM PART	USE
RSR-D2 Transfer – sealed sources	**When:** • you have a permit relating to sealed sources; and • you want to transfer all or part to a different legal entity
RSR-D3 Transfer – open sources & waste	**When:** • you have a permit relating to open sources or waste; and • you want to transfer all or part to a different legal entity
RSR-E2 Surrender - sealed sources	**When:** • you have a permit relating to sealed sources; and • you want to surrender all or part of the permit
RSR-E3 Surrender – Nuclear Site - open sources & waste	As above but your premises are a nuclear licensed site
RSR-E4 Surrender – Non-nuclear site - open sources & waste	As above but your premises are not a nuclear licensed site
RSR-F Charges & declarations	For all applications – radioactive substances activities

As an example if you are a non-nuclear site and wish to vary an existing open source registration and/or authorisation then complete forms A, F and C4.

Separate guidance is provided for nuclear and non-nuclear sectors with some advice on how to complete each part of the form is available on the EA website and of course from L2 Business Consulting Limited. For existing or prospective customers, the first step is to give us a call to discuss your issues or needs.

Inspection Reports

As part of the improved procedural arrangements under EPR10 the EA have introduced 'Radioactive Substances Compliance Assessments Reports' (RASCAR) following an inspection. The aim is to always provide a standardised written report following an inspection and to improve consistency within the system.

The RASCAR will be completed by the EA Inspector within 2 weeks of a visit and the operator would be given the opportunity to challenge the report if they feel it necessary. They will be sent to the site contact. Guidance will be issued on what is considered as non compliance. Poor compliance might at some future stage result in higher subsistence charges.

RASCAR will live in the public domain unless there are security issues. The EA have stated that the Inspector would be careful to refer to personnel by their job title rather than by an individual's name. RASCARs will be fed into future compliance charges, encouraging improved compliance.

RASCAR will show the Compliance Classification Scheme and this will be used in the future years to determine the charges. It will not be used in this coming year ie 2011-12.

Charges

The EA still have to recover all its costs. Charging arrangements have been revised and moved into an existing EPR charging scheme. The banded scheme appears to be complicated (2010-11 Scheme is within a 147 page document!) and further guidance is to be provided by EA in the near future. The charging scheme for applications and annual subsistence is based on the EA Operational risk assessment scheme (known as Opra).

RPA News (continued)

The activities covered by a permit vary in the amount of risk they pose to the environment. The higher the level of risk, the more regulation the activity requires. EA divide the level of risk, and hence required regulation, into three tiers:

- **Tier 1** - covers low risk activity that needs a form of permit eg registrations that are issued automatically on request. Charges in Tier 1 are fixed.
- **Tier 2** - covers medium and standard risk facilities eg registrations that require a decision, standard conditions facilities and a number of radioactive substance activities. Charges in Tier 2 are fixed.
- **Tier 3** - covers more complex and high risk facilities that require more detailed and individually tailored bespoke permits. Charges in Tier 3 are based on actual time spent and costs incurred.

There are no charges in Tier 1 in the 2010-11 Scheme. Tier 2 covers almost all non-nuclear sites and Tier 3 covers nuclear sites. Radioactive Substances Charges for non-nuclear activities have been subject to a fundamental review and EA have introduced a new charging arrangement for disposal of low level radioactive waste which is based on time and materials.

Details can be found in Environmental Permitting Charging Scheme Guidance on the EA website.

EA New Powers

As reported in our last RPA Newsletter under The Regulatory Enforcement and Sanctions Act 2008 a new Order (The Environmental Civil Sanctions (England Order 2010)) came into force in April which allows EA to impose civil sanctions on a business committing certain environmental offences as an alternative to prosecution and criminal penalties of fines and imprisonment. It is designed to be more proportionate and reflect the fact that most offences committed by business are unintentional. These new civil sanctions include:

- Compliance Notice – written notice to take steps to ensure that an offence does not continue or recur
- Restoration Notice - written notice to restore harm caused by non-compliance
- Enforcement Undertaking - voluntary agreement by business to take corrective action to make up for non-compliance
- Fixed Monetary Penalty - low level penalty for minor offences fixed at £100 for an individual and £300 for a company
- Variable Monetary Penalty - a monetary penalty for more serious offences with a maximum of £250,000
- Stop Notice - written notice to stop an activity which is causing harm.

At present these sanctions will apply to harm to water or wildlife, poor drainage and waste management. Others will be added by future legislation. See our Radiation News section below on when these new powers will begin to be used.

Radiation News

This section of the Newsletter is intended to provide background information on various topics that are relevant to nuclear and industrial users of ionising radiation. The information topics in this issue are Radiation Monitor Testing and Risk Assessment.

Radiation Monitor Testing

IRR99 Regulation 19(2) states that monitoring equipment must be 'properly maintained' and 'adequately tested and examined at appropriate intervals'. These intervals are defined in the associated ACOP as being 'once every year'. All such tests must be carried out by, or under the supervision of, a Qualified Person who 'should possess the necessary expertise in instrumentation, theory and practice appropriate to the type of instrument to be tested'.

Although monitor testing is only a legal requirement for instruments used in 'Supervised' and 'Controlled' areas (defined under Reg16 of IRR99), it is recommended that all monitors should be tested before being used for the first time and then on an annual basis. Re-testing should also be carried out after any repairs or adjustments to a particular monitor.

In determining what is appropriate for the examination and testing of monitoring instruments, due note must be taken of the guidance given in IRR99 ACOP paragraphs 352-366 and NPL Measurement Good Practice Guide No.14 entitled The Examination, Testing & Calibration of Portable Radiation Protection Instruments.

Measurements used to demonstrate compliance with IRRs should be traceable to national standards.

Examination

Before periodic testing and calibration, a thorough examination of the monitor must be carried out to ensure that the instrument is still fit for purpose. Any damage caused through wear and tear or misuse needs to be identified and rectified before performing any radiological tests. A 'before test' thorough examination should also include the following checks:

- Battery
- Switches and cables
- Zero Settings – all ranges
- Background reading

Employers should also carry out these checks for themselves on a regular basis.

Testing Calibration

For new monitors 'Tests Before First Use' are required to establish that the instrument conforms to 'type' and determine its suitability for the intended use. Type test data can be obtained from manufacturers/suppliers. This test for dose rate monitors should encompass:

- Response to high dose rates
- Linearity
- Energy dependence
- Directional dependence
- Background indication

Subsequent annual tests, or at more frequent intervals if deemed appropriate by the RPA, are to establish that the instrument has not lost its calibration and continues to meet the appropriate standard (±30% of type test data or established average monitor response). Pass/fail criteria should be established for all tests.

Radionuclides used for calibration/testing should if possible reflect the Radionuclides/X-rays used by the employer or cover the range of energies which the monitor will encounter. It is important that employers inform the testing laboratory of their uses of ionising radiations.

Certification

The calibration/test certificate should detail the following:-

- Name and address of customer
- Date, place and type of test
- Details of instrument(s) tested (e.g. type and s/n of instrument and probe)
- Basic description of test & results eg response or calibration factor
- Limitations of the calibration or limitations of the use of the instrument
- Comments on any repairs or adjustments made
- Statement that tests were carried out in accordance with Regulation 19(2) of IRR99
- Names and signatures of person carrying out the test and the QP responsible
- Name and address of laboratory carrying out the test

Risk Assessment

One of the most common reasons the HSE issue an enforcement notice relating to work with ionising radiation is the failure to carry out, and review, a suitable risk assessment.

Regulation 7 of IRR99 requires that before commencing a new work activity involving ionising radiations the radiation employer has a responsibility to ensure that a suitable and sufficient risk assessment is made which identifies the hazards and evaluates the nature and magnitude of the risks to which both workers and members of the general public could be subjected.

When conducting a risk assessment there are 4 main elements to be addressed, namely:

- Identification of hazards
- Assessment of risk taking into account all foreseeable accident scenarios

- Review of control measures
- Implementation of any recommendations

It is important to identify significant risks and the time, effort and detail of a risk assessment should be proportionate to the perceived risk and action required. The law does not expect you to eliminate all risk, but you are required to protect people as far as is 'reasonably practicable' ie the ALARP principle. Involve employees in the risk assessment so as to obtain worker buy-in and also to utilise their knowledge and experience from carrying out the work.

Requirements for radon risk assessments are often overlooked by employers. Many more areas have now been declared 'Radon Affected Areas' where all ground floor and below ground workplaces must be assessed.

The risk assessment should be recorded and needs to be regularly reviewed. It is good practice to record a date by which it should be reviewed on the assessment form. In producing a risk assessment use paragraphs 44 & 45 of ACoP as a checklist because this is what your HSE inspector will do when he visits!

It should be remembered that a risk assessment should be carried out before work commences. It is not necessary to carry out a further risk assessment on each occasion before the activity starts if the working conditions are unchanged. This is unlikely to be the case for site work eg site radiography and a site specific risk assessment must be made to ensure that all new hazards are considered. In addition, under the Management of Health and Safety at Work Regulations 1999 (regulation 3) a suitable and sufficient risk assessment must be carried out for all work activities and a radiation employer should not want to consider the radiation protection aspects of the work in isolation from other health and safety considerations. Therefore, the radiation employer will need to consider both the radiation and conventional risks associated with the tasks and/or alternative techniques in order to satisfy both sets of Regulations.

Enforcement action is usually a result of either failing to produce a suitable and sufficient risk assessment or failing to implement the findings of one.

New Environment Agency Enforcement Powers

The Environment Agency will start using new enforcement powers, called civil sanctions, from 4 January 2011. These alternatives to criminal penalties are designed for less serious offences in situations where organisations trying to do the right thing but not meeting the required statutory minimum requirements.

Training

L2 Business Consulting offer a range of public and bespoke training for industrial and nuclear customers covering:

- RSA93/EPR10 Permitting
- Radiation Protection Supervisor
- RPS Refresher
- Ionising Radiation Worker
- RAM Transport
- Nuclear Site Licensing & Permitting
- LLW Management
- QA Requirements for Nuclear Industry

Our courses can be undertaken in our offices, client premises or other suitable venues and are all delivered by experienced practiconers in the relevant fields. The courses include a mixture of classroom based training combined with group and practical exercises. They can also be customised to a client's individual requirements

For more information or to receive our 2011 course schedule please contact **Bob McGeary** on **0191 276 2070** or **bob.mcgeary@l2businessconsulting.com**

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