

Health and Safety Executive

Public consultation on ONR's interpretation of "bulk quantities" of radioactive matter

Respondent's details:

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Size of organisation:	Not applicable
Confidentiality:	DSG is content for these views to be made public.
What is your type of organisation:	Dounreay Stakeholder Group – the primary purpose is to be the main interface between the community, the Site operator and the Nuclear Decommissioning Authority.
In what capacity are you responding?	As a Stakeholder Group with an interest in nuclear issues.

Questions:

1. **Is "activity" the correct criterion for HSE to use when determining whether bulk quantities of radioactive material are being stored?**

Yes, while we recognise there are a number of criteria that could be considered, ie risk, the 'activity' is the one that can be measured without too much difficulty. That said it will be incumbent on the organisation to ensure that when speaking with stakeholders the language used is consistent, clear and easy to understand.

2. **If you do not agree with HSE's proposed criterion, what alternative criterion should be used and why?**

Not applicable – see question 1 above.

3. **Do you agree with the proposals to disregard “sealed sources” for the purposes of determining whether a bulk quantity of material is being stored?**

Yes, given the reasoning behind this and the fact that sealed sources are already heavily regulated we see no need for additional burdens to be placed on this and therefore sealed sources should be exempt.

4. **Do you agree with HSE’s view that a bulk quantity will be a quantity of radioactive materials that has an activity level of [at or above] 100 times REPPIR values?**

Yes, for the reasons HSE has explained this appears to be a sensible way forward. Again, it will be important to ensure that reporting is done in a way that is easily understood by all stakeholders.

5. **If you do not agree with the proposal in Q4, what value should HSE use to determine whether a bulk quantity of materials is being stored?**

Not applicable.

6. **Do you agree with our assessment of the impact of proposed interpretation of “bulk quantities”?**

Yes, this appears to be a reasonable way forward.

7. **Are there any further comments you would like to make on the issues raised in this consultation document that you have not already responded to in this questionnaire?**

This is a particularly confusing issue with regards to what HSE is trying to accomplish here to bridge a gap in legislation. We believe that the legislation, at some point, will be considered under the Brussels and Paris convention but for lay stakeholders it is a particularly difficult issue to understand the difference. HSE should continue to ensure that explanations are provided in a way which is easy to understand by all those with an interest.

8. **Is there anything you particularly liked or disliked about this consultation?**

DSG would like to take this opportunity to thank HSE for involving them in the workshops and discussions on this issue. By attending the workshop and receiving the notes of the meetings it allowed a better understanding than simply reading a consultation document.

22nd November 2011