

Consultation on Approved Code of Practice for the Radiation (Emergency Preparedness and Public Information) Regulations 2019

The **Dounreay Stakeholder Group** (DSG) is represented by over 20 organisations and therefore this response is one that is generally agreed by most organisations. However, there are some organisations, who may not agree entirely with this submission and therefore have been encouraged to provide their own response.

Consultation questions

General

Q1 - The proposed ACOP is:

easy to understand **not easy to understand**

Please provide reasons for your answer. For example, if not, which parts are not easy to understand and why?

The document is helpfully detailed and not ambiguous.

Q2 - Do you think that the proposed ACOP:

Provides clear advice on what to do? Does not provide clear advice on what to do?

Please provide reasons for your answer. For example, if not which parts are not clear and why?

It provides clear advice but views included a suspicion that there would be a lot of bureaucratic work to compile documents to satisfy this ACOP albeit that the information is available in many different places.

Specific

Q3 - The requirements specified in proposed ACOP (a&b) under Regulation 8(1) are:

easy to understand **not easy to understand**

If it is not easy to understand, please tell us why.

Click here to enter text.

Q4 - Proposed ACOP under Regulation 10(2) lists four variable factors. Are there other variable factors we could include as ACOP?

Yes

No

If yes, please tell us what these are and why they should be included.

Click here to enter text.

Q5 - Is the proposed ACOP (B) under Regulation 12(1):

easy to understand and

not easy to understand and

If not please tell us why.

Click here to enter text.

Q6 - Is the process for deciding what to exclude from a consequence report set out in proposed ACOP (B) under Regulation 21(10):

clearly set out

not clearly set out

If it is not clearly set out, please tell us why.

Click here to enter text.

Q7 - Do you agree that the proposed process set out in ACOP Schedule 3(7-8), is the most appropriate way for the operator to identify the minimum geographical area for the detailed emergency planning zone? Yes/No

If not, please tell us why.

Unsure – this would be for operators to respond to as they will understand the extent of this.

Q8 Are there any impacts on introducing this new ACOP that we should be aware of?

ONR should not assume that because documents to the new ACOP are in process or not available that the information and readiness of operators/sites is not robust.

How to respond

The preferred method for receiving comments on the ACOP and guidance is by email to the Contact ONR Account: Contact@onr.gov.uk

Hardcopy responses can be sent to the below address:

Contact ONR (ACOP Consultation)
ONR Policy & Communications Team
The Office for Nuclear Regulation (ONR)
4.S.3. Redgrave Court

Merton Rd
Bootle
Merseyside
L20 7HS

To enable us to provide follow-up information in relation to the consultation, please provide an email address with any written responses.

We would be grateful if you could send an email address when you provide your response. This will allow us to inform you when HSE intends to publish information concerning consultation responses on its website.

Responses must be received by **5 June 2019**.

If you require a more accessible format of this document please send details to the contacts previous and your request will be considered.