LLW Treatment and Disposal Routes

Accessing the Waste Services

Information & Guidance
NWP-REP-093 – Issue 2 – July 2016
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Document history

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<tr>
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<tbody>
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<td>1</td>
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<td>July 2016</td>
<td>Updated to reflect changes in the metallic treatment framework and LLW Repository Ltd website.</td>
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National Waste Programme

Quick Guide to LLW Repository Ltd.


**LLW Repository Ltd.** - The Site Licence Company that manages and operates the LLWR, which is owned by the Nuclear Decommissioning Authority (NDA) and manages the Waste Services. LLW Repository Ltd also runs the National Waste Programme on behalf of the NDA.

### Diversion and Alternative Waste Services:
To preserve capacity at the LLWR, LLW Repository Ltd offers access to diversion and alternative waste services:

- **Metallic LLW:** Treatment by physical decontamination and melting
- **VLLW:** Very Low Level waste disposal to permitted landfill
- **Cobustibles:** Incineration service for soft / combustible waste
- **Alternative Treatment Solutions:** For wastes which cannot be treated or disposed by other routes

### Accessing LLW Repository Ltd’s Waste Services
Waste producers wishing to consign waste to the LLWR or to use the Waste Services must become a customer of LLW Repository Ltd. An **Agreement in Principle** can give reassurance that waste will be accepted, prior to its arising. A **Waste Services Contract** must be agreed and signed by LLW Repository Ltd and the customer. In addition customers must have in place the appropriate **environmental permit** or **disposal authorisation** to allow them to transfer their waste to another site.

### Disposal Services
LLW Repository Ltd offers disposal services for LLW:

- **Supercompaction** – high-force compaction of LLW to reduce volume prior to disposal.
- **LLW disposal** – grouting and emplacement of ISO-freights of LLW in an engineered facility (the LLWR).

### Additional Services
In addition, LLW Repository Ltd offers access to the following enabling and supporting services:

- **P** packaging
- **T** transport
- **W** waste characterisation
- **E** expert support

**Early Engagement** – it is advised that customers or potential customers contact LLW Repository Ltd to discuss their requirements as soon as possible. This allows any issues or potential problems to be dealt with early on, preventing more serious issues from arising in the future.
## National Waste Programme

### Contents

1. **Aim and purpose** ................................................................. 5
2. **An Introduction to LLWR Repository Ltd** ........................................ 5
3. **LLW Repository Ltd Waste Services** ............................................. 7
   3.1. **What are the waste diversion and disposal services?** .............. 7
   3.2. **Which organisations provide the waste services?** .................. 8
   3.3. **Supporting and Enabling Services** ...................................... 9
   3.4. **Pricing** .............................................................................. 10
   3.5. **Further Information** .......................................................... 10
4. **Accessing the Waste Services** ................................................ 11
   4.1. **Pre-requisites to Consigning Waste** ..................................... 11
      4.1.1. **Environmental Permit / Disposal Authorisation** ............... 11
      4.1.2. **Agreement in Principle** ............................................... 12
      4.1.3. **Waste Services Contract** .............................................. 12
      4.1.4. **Waste Assurance Process** ............................................. 13
   4.2. **Waste Forecasting** ............................................................ 13
   4.3. **Waste Characterisation** ...................................................... 14
   4.4. **Transfrontier Shipment Authorisation** ................................... 14
   4.5. **Third Party Waste Agreement** ............................................ 14
5. **Consigning Waste under the Waste Services** ................................ 15
   5.1. **Standardised Service** ...................................................... 15
   5.2. **Bulk Orders** ....................................................................... 16
   5.3. **Non-standard Service** ...................................................... 16
   5.4. **Variations** ......................................................................... 17
6. **Accessing the Supporting and Enabling Waste Services** ............... 18
7. **Waste Management Decision Making** ......................................... 19
8. **Training** ................................................................................. 21
   8.1. **Accessing the e-learning** .................................................. 21
   8.2. **Available modules** ............................................................. 21
9. **Contacts** .................................................................................. 23

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**OFFICIAL (NO MARKINGS REQUIRED)**
1. **Aim and purpose**

This document provides an overview of the waste treatment, disposal and support services available through LLW Repository Ltd. Each of the waste treatment and disposal services is described briefly, including examples of the types of waste for which the route may be appropriate. Descriptions of the supporting and enabling services available through LLW Repository Ltd’s Waste Services are provided as is guidance on accessing these services. Further sources of information are signposted along with relevant contact details.

2. **An Introduction to LLW Repository Ltd**

LLW Repository Ltd is responsible for managing the Low Level Waste Repository (LLWR), near Drigg, Cumbria, a site owned by the Nuclear Decommissioning Authority (NDA). LLW Repository Ltd holds the Nuclear Site Licence and the environmental permit which allow the facility to operate. In addition LLW Repository Ltd manages the Waste Services, a set of commercial frameworks which provide alternative treatment and disposal routes to disposal in the LLWR. LLW Repository Ltd also runs the National Low Level Waste Programme (NWP) on behalf of the NDA.

2.1. **The Low Level Waste Repository**

The LLWR is the UK’s national facility for the disposal of Low Level Radioactive Waste (LLW). Since 1988, waste has been disposed of in half-height steel ISO (HHISO) freight containers in engineered vaults. Supercompaction is applied to the raw waste as far as is practicable, (according to the type of waste material) at offsite facilities, to reduce waste volume prior to packaging in the container. Compacted waste and non-compactable wastes are packed into HHISO containers. Following receipt of the HHISO containers at the repository site, checks are undertaken and low viscosity grout is added, which flows through the waste filling all accessible voids and forming a structurally monolithic block. The containers are then stacked in engineered concrete vaults. Some large items may be non-containerised and grouted in situ in the repository.
Disposal of waste at the repository is controlled by a set of Waste Acceptance Criteria (WAC), which enable the radiological and non-radiological hazards to be appropriately managed. LLW Repository Ltd has in place robust assurance processes and procedures to ensure that waste consigned to the repository meets the WAC. The WAC are based on the information set out in the LLW Repository Ltd Environmental Safety Case (ESC). The ESC is a set of arguments which explain how disposals at the LLWR are carried out in a manner which provides protection for people and the environment, both now and in the future.

2.2. Waste Services (Diversion)
LLW Repository Ltd has developed and manages a set of commercial frameworks to provide a range of services to support waste producers in managing their LLW using treatment and disposal options other than disposal to the LLWR, whenever this is the Best Available Technique (BAT). The purpose of these services is to protect the volumetric and radiological capacity of the LLWR for wastes that require disposal in such engineered facilities, by diverting waste to other waste management routes. The services include decontamination and melting for metallic waste, incineration for soft and organic waste and the provision of alternate disposal sites for lower activity LLW and Very Low Level Waste (VLLW).

2.3. The National Low Level Waste Programme (NWP)
The National Waste Programme (NWP) leads the ongoing delivery and implementation of the UK Nuclear Industry Solid LLW Strategy across the UK, covering all nuclear industry waste producers including those within the Nuclear Decommissioning Authority (NDA) estate, public sector bodies such as sites owned by the Ministry of Defence, and private sector businesses. LLW Repository Ltd leads the implementation of the UK LLW Strategy for the Nuclear Industry through the work of the National Programme Office and Waste Management Services. This is achieved by managing a structure to support other organisations in implementation of the strategy and by supporting the sharing of best practice in LLW management.
3. LLW Repository Ltd Waste Services

What services are available through LLW Repository Ltd’s waste services frameworks?

<table>
<thead>
<tr>
<th>Metallic treatment</th>
<th>VLLW</th>
<th>LLW disposal</th>
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<tr>
<td>Transport</td>
<td>Supercompaction</td>
<td>Expert Support</td>
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<tr>
<td>Combustible</td>
<td>Waste Characterisation</td>
<td>Packaging</td>
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3.1. What are the waste diversion and disposal services?

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<tr>
<th>What LLW diversion and disposal services can LLW Repository Ltd provide?</th>
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LLW Repository Ltd

National Waste Programme

This service is a volume reduction option. Soft solid waste can be treated by high force compaction to reduce its volume. The secondary waste product (supercompacted drums) is consigned to the LLWR for disposal.

The repository site is used for the disposal of LLW which is unsuitable for re-use or recycling, or cannot otherwise be diverted and requires an engineered disposal facility.

3.2. Which organisations provide the waste services?
Early Engagement
We would advise all new customers to discuss their waste management needs with LLW Repository Ltd as soon as they are aware they require our treatment or disposal services. Early engagement allows any potential issues to be identified and resolved.

3.3. Supporting and Enabling Services
In addition the waste treatment and disposal services described above, LLW Repository Ltd’s Waste Services include a range of services designed to facilitate and enable LLW management. These services are described in the table below.

<table>
<thead>
<tr>
<th>What other LLW services can LLW Repository Ltd provide?</th>
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<tr>
<td>The Logistics Services offer a range of single use and re-useable containers which are licensed for radioactive waste transport. Packaging support services are also available including package inspection; package repair; provision of advice on the preparation of Waste Loading Plans; and the preparation of standard (cross-industry) Waste Loading Plans.</td>
</tr>
<tr>
<td>The transport service forms part of the integrated logistics services available through LLW Repository Ltd. The safe, secure and efficient service includes road / rail (multimodal) in the UK and overseas. LLW Repository Ltd can provide road and rail transport solutions in compliance with UK and International Transport Regulations.</td>
</tr>
<tr>
<td>The Waste Characterisation service includes all stages of characterisation and related activities, including support in the development and preparation of sampling strategies and plans; development of sampling technologies; sample recovery, analysis and measurements; data interpretation; and advice on routing. Further information is available at: <a href="http://llwsite.com/waste-services/our-services/waste-characterisation/">http://llwsite.com/waste-services/our-services/waste-characterisation/</a></td>
</tr>
</tbody>
</table>
| The Expert Support Services are provided by Studsvik, MWH and URS. The services include:  
  - Project management and technical / operational support  
  - Best Practicable Environmental Option (BPEO) studies and BAT assessments  
  - Decommissioning and deplanting  
  - Permitting, compliance and documentation  
  - Transport services including loading plans and international transport |
| The alternative treatment solutions service is for waste which cannot be consigned to any of the waste diversion or disposal routes, usually because they do not meet the WAC for any of the existing treatment or disposal facilities. This includes problematic wastes for which the Alternative Treatment Solutions service supports the development of novel treatments. |
3.4. Pricing
LLW Repository Ltd publishes pricing norms for all the services offered. These can be found on http://llwrsite.com/waste-services/service-pricing/, these norms can provide an indicative cost for projects. Please note these prices are not fixed and all projects are priced on a case by case basis.

3.5. Further Information

Further information about the waste treatment and disposal services is available on the LLW Repository Ltd website http://llwrsite.com and the Waste Services section of the website http://llwrsite.com/waste-services/ or by contacting the Customer or Logistics Team (contact details provided in Section 9).

Specific information about what can and cannot be accepted at specific waste management facilities can be found in the facility waste acceptance criteria (WAC) and Environmental Permits. WAC may change from time to time, due to permit changes, operational requirements or other factors. For this reason, the specific WAC for the different facilities are not included in this document. The current WAC can be obtained via the websites of the individual organisations or by contacting LLW Repository Ltd's Customer Team.
4. Accessing the Waste Services

The waste acceptance procedure is set out in an overview document available on the LLW Repository Ltd website¹. This tells waste producers how to consign waste to the treatment and disposal facilities and gives an overview of the operation of the LLWR, the LLW Repository Ltd waste services, and the contractual arrangements between LLW Repository Ltd and its customers. This section provides an overview of the pre-requisites necessary to access the waste services. Note that throughout the text the grey italic subtitles to the headings refer to the level that the document / activity needs to be carried out at.

4.1. Pre-requisites to Consigning Waste

What are the requirements for consigning waste through LLW Repository Ltd waste services?

The following are required:

- Environmental Permit / Disposal Authorisation
- Agreement in Principle
- Signed Waste Services Contract
- Completed Waste Forecasting Form
- Completed Waste Characterisation Form(s)
- Completed Waste Assurance Form

The following may be required:

- Transfrontier Shipment Authorisation
- Third Party Waste Agreement

4.1.1. Environmental Permit / Disposal Authorisation

Before waste can be consigned to LLWR or to any treatment service provider or alternate disposal site, the waste producer must be in possession of an Environmental Permit issued by the Environment Agency (EA) under the Environmental Permitting Regulations

2010, or a Disposal Authorisation issued by the Scottish Environmental Protection Agency (SEPA) under the Radioactive Substances Act 1993. The permit or disposal authorisation must include a condition which allows the transfer of waste to another provider. This is likely to be a general condition which allows transfer of waste to any other holder of an appropriate environmental permit. This condition is likely to have limits on the amount of radioactivity which may be transferred.

4.1.2. Agreement in Principle
An agreement in principle is used when waste may not be ready for consignment for some time, but the customer requires reassurance that the waste will be accepted for disposal. The agreement in principle may be used by a customer to support an application for an environmental permit or disposal authorisation.

Figure 3: Process for obtaining pre-requisites to use waste services

4.1.3. Waste Services Contract
Customers must enter into a Waste Services Contract with LLW Repository Ltd in order to access the services. The contract incorporates four key elements:

- Terms and Conditions
- Waste Acceptance Criteria
- Waste Acceptance Procedure
- Service Pricing Mechanisms

Note: For new customers, it may take up to six months for a Waste Services Contract to be put in place.

4.1.4. Waste Assurance Process

The waste assurance process enables customers to provide assurance to LLW Repository Ltd that their waste management arrangements and procedures for consigning waste for treatment and/or disposal comply with the requirements of both the Waste Acceptance Criteria and the waste acceptance process.

LLW Repository Ltd undertakes activities to provide assurance that waste consigned for treatment and/or disposal is as described.

The Waste Assurance Process is an ongoing process between the customer and LLW Repository Ltd for the duration of the Waste Services Contract, and contains four elements, which are:

- The customer’s Quality Management System
- A Waste Assurance Form, submitted by the customer, which describes their Quality Management System.
- Verification of waste consignments
- Waste Assurance Audits of the waste producer’s LLW management processes and procedures against their own quality management system.

The Waste Assurance Form must be completed by the customer when they have identified waste for consignment. Approval of the form by LLW Repository Ltd is required prior to customers proceeding with the waste acceptance procedure.

An approved Waste Assurance Form must be in place in order for LLW Repository Ltd to approve any Waste Consignment Information forms.

Further details concerning the waste assurance process are available on the Waste Services section of the LLWR website.

4.2. Waste Forecasting

*Organisation / Site Level – 5 year rolling forecast, updated every 6 months.*

Customers of LLW Repository Ltd must complete and submit a waste forecast, detailing their predicted waste arisings over a five year period. The Waste Forecasting Form
must be updated every six months to provide a rolling five year forecast. The waste forecasts are used by LLW Repository Ltd to manage the waste acceptance process. The Waste Forecasting Form, as well as guidance on its completion, are available on the Waste Services section of the LLWR website².

4.3. Waste Characterisation

_Wastestream Level – Valid for up to 5 years (requires justification)_

LLW Repository Ltd requires all new customers or customers consigning a new wastestream to submit a Waste Characterisation Form (WCH). This includes details of the characterisation the customer has undertaken for that wastestream. This provides assurance to LLW Repository Ltd that the customer’s characterisation procedures are robust and will provide an accurate fingerprint for the waste being consigned. The WCH is available from the Waste Services section of the LLW Repository Ltd website³. Free online training on completing the WCH is provided by the National Waste Programme and is available via the Nuclear Training Network⁴.

4.4. Transfrontier Shipment Authorisation

In cases where LLW is to be treated abroad, a Transfrontier Shipment Authorisation may be required. Waste management services available under the LLW Repository Ltd framework enable access to TFS for waste movements overseas and so individual TFS for each waste producer organisation are not a pre-requisite to use of the services. However, waste producers may identify operational advantages in holding their own individual TFS, and so may seek their own TFS for use of overseas routes.

4.5. Third Party Waste Agreement

For waste producers who have only small amounts of LLW arisings, it may not be necessary to obtain a waste services contract with LLW Repository Ltd. Instead, such waste producers may be able transfer the title and ownership of their waste to an organisation which is an existing customer of LLW Repository Ltd. The customer organisation would, in this case, complete a third party waste agreement which would be signed by both parties. Waste producers for whom this system may be applicable should contact the Customer Team for further information.

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5. **Consigning Waste under the Waste Services**

Once a customer has a consignment of waste which they wish to send for treatment or disposal, the waste acceptance procedure is followed. This may include the production of a Waste Characterisation Form if one is not already in place for the wastestream in question. The process is shown in Figure 4. Each step is described in further detail below. Note that throughout the text the grey italic subtitles to the headings refer to the level that the document/activity needs to be carried out at.

Figure 4: Process and documentation for accessing waste treatment and disposal services

![Diagram](image_url)

Note: Not all steps undertaken by LLW Repository Ltd personnel are shown: for further information contact the LLW Repository Ltd Customer Team or see llwrsite.com.

5.1. **Standardised Service**

**Standardised Service**: LLW Repository Ltd manages a standardised service for combustible wastes. Customers with waste which meets the acceptance criteria for the standardised service do not need to submit a Waste Enquiry Form (WEN), but may proceed to the submission of a Waste Consignment Information Form (WCI).

For the standardised services, the movement of a specific consignment of LLW begins with the submission of a Waste Consignment Information Form (WCI). The WCI
contains detailed information about the specific waste consignment, including radiological properties and packaging and transport details. The information provided by the customer will be used to establish if the consignment can be approved and meets the Waste Acceptance Criteria.

In the case of the Standardised Service, a Waste Services Quotation (WSQ) is issued on approval of the WCI. Upon agreement of the price on the WSQ by the customer, arrangements for consigning the waste can be made.

5.2. Bulk Orders

Bulk Orders: LLW Repository Ltd manages, where appropriate, bulk orders on behalf of customers. There are essentially orders for (typically) multiple years and covering multiple wastestreams. In some circumstances, customers may be able to access bulk orders put in place by other customers.

Once established (which follows the process for non-standard service, described in section 5.3) bulk orders operate similarly to standardised services with the submission of WCI and agreement of WSQ.

5.3. Non-standard Service

Consignment / Wastestream / Project Level

Non-Standard Service: used for any project which does not meet the requirements for a standardised service or for which there is not already an available and appropriate bulk order in place.

The non-standard service commences with the Waste Enquiry Process, which is related to a particular quantity of waste and can be used to enquire about the suitability of a range of waste volumes for treatment and / or disposal services.

Customers wishing to consign waste to LLW Repository Ltd under the non-standard service must complete a Waste Enquiry Form (WEN) that provides outline information about the waste to be consigned and the potential waste treatment and / or disposal options that can be applied. The form requires a detailed waste description, waste composition, physical properties, radiological properties and waste packaging options. The waste enquiry process can be used for a variety of consignment types, such as a one-off large item, a multi-year operational wastestream, an entire decommissioning project or a single consignment of mixed waste. The process (Figure 4) begins with the customer completing the WEN; this is reviewed by LLW Repository Ltd, and if accepted, will be issued to service suppliers as necessary, LLW Repository Ltd will then issue a Waste Services Quotation. Free training on completing the WEN is available on the Nuclear Training Network website (see Section 9).
Once the WEN has been quality checked by LLW Repository Ltd, it is distributed to suppliers so that they can produce a Waste Services Quotation (WSQ), which is issued to the customer by the LLW Repository Ltd Customer Team. If a customer accepts a WSQ, the arrangements will be made to consign the waste.

If the WSQ issued by LLW Repository Ltd or its service supplier is accepted by the customer, the WCI will be completed by the customer. The WCI contains detailed information about the specific waste consignment, including radiological properties and packaging and transport details. The information provided by the customer will be used to establish if the consignment can be approved and meets the Waste Acceptance Criteria. In the case of LLWR disposals, the information provided will also be used to manage the emplacement of the consignment and to provide the lifetime record for inventory purposes. Training on completing the WCI is available free of charge on the Nuclear Training Network.

5.4. Variations
Some wastes which do not meet the WAC. It may still be possible to consign the waste, through the variation process. A variation is submitted along with a WCI by the customer. LLWR may approve this immediately or may ask that the customer provides additional documentation or undertakes additional work or testing (for example, leach testing) before the consignment is approved.
6. Accessing the Supporting and Enabling Waste Services

The packaging, transport, waste characterisation and expert support services are available to waste producers with an existing Waste Services Contract with LLW Repository Ltd.

New customers will require a waste services contract with LLW Repository Ltd to access these services. See pages 10-12 in this document.

Packaging supply services may be accessed through the e-Logistics portal or by contacting the logistics services team. Other packaging services should be obtained by contacting the Packaging team at LLW Repository Ltd.

Transport services should be accessed and requested through the e-Logistics portal. Requests and enquiries for the transport services can also be made by contacting LLW Repository Ltd.’s transport services team. This includes booking, requesting transport, viewing past consignments and tracking current transport activities.

The characterisation services can be requested by completing a Characterisation Services Form and emailing to the customer team at customerteam@llwrsite.com. The form can be downloaded at http://llwrsite.com/waste-services/our-services/waste-characterisation/.

The Expert Support and Alternative Treatment services can be accessed by submission of a Service Enquiry Form to the customer team at LLWR. The Service Enquiry Form is available at http://llwrsite.com/waste-services/waste-acceptance-procedure/. 
7. Waste Management Decision Making

Many factors will play a part in influencing the decision on the appropriate treatment or disposal route for LLW. These will include the characteristics of the waste itself, which will determine the acceptability of the waste at treatment or disposal facilities (i.e. whether or not the waste will meet the waste acceptance criteria). Other influencing factors may be specific to the waste producing organisation (e.g. environmental permit restrictions) or may be external to the waste producing organisation (e.g. availability of appropriate treatment technologies).

Other factors influencing waste management decisions include compliance with regulatory requirements such as permit and site licence conditions, observance of national policy and adherence to code of practice and international guidelines.

There are a series of more generic waste management principles which also should be considered when making decisions on waste management routes and approaches, as described in Figure 5:

- **Best Available Technique / Best Practicable Means (BAT / BPM)** – arguably the biggest influence, as this is a requirement on waste producers under their Environmental Permits / Discharge Authorisations.
- **The Waste Hierarchy** – this is another significant influence as consideration of the Waste Hierarchy is a requirement under the 2007 Policy for Long Term Management of Solid Low Level Radioactive Waste in the United Kingdom and the 2010 UK Strategy for Management of Solid Low Level Waste from the Nuclear Industry.
- **As Low As Reasonably Achievable (ALARA)**
- **Presumption to early solutions**
- **Proximity principle**

Waste management decisions should be robust and technically underpinned, with consideration of the all relevant decision making factors (waste and producer specific as well as the generic principles).

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Waste producers should ensure that the best option is achieved for the management of waste; with consideration and balance of all relevant factors such as cost, safety, environmental impact, technical feasibility and proportionality.

This defines a ranked list of waste management options in order of their environmental impact (from best to worst: prevent → minimise → reuse → recycle→ dispose). Waste producers should have a preference for options that have least environmental impact (i.e. are at the top of the hierarchy).

Waste producers should have a preference towards solutions that can be applied sooner rather than later.

There should be a preference towards geographically nearer management or disposal facilities (to minimise transport). This is complex for LLW management where there are a limited number of facilities available.

This is a radiation safety principle – ionising radiation dose and release to the environment should be minimised using all reasonable means.
8. **Training**

LLW Repository Ltd’s National Waste Programme has developed several training modules which are publically and freely available through the nuclear training network website: ([https://www.nucleartrainingnetwork.com/](https://www.nucleartrainingnetwork.com/)). The training modules are designed for LLW Repository Ltd.’s customers, to make consigning waste to the LLWR and through LLW Repository Ltd.’s waste services more straightforward. The modules have been developed for waste engineers in organisations consigning waste for disposal or treatment through LLW Repository Ltd.

8.1. **Accessing the e-learning**


8.2. **Available modules**

The available e-learning modules, accessible via the Nuclear Training Network, are summarised in Figure 7.

There are also two classroom modules available, as summarised in Figure 8, via the National Waste Programme. For more information on accessing the classroom modules, contact the National Waste Programme.
Figure 7: E-learning modules available via the Nuclear Training Network

- **Completing the Waste Characterisation Form (WEN)**: This module provides information on the completion of the Waste Characterisation Form.

- **Completing the Waste Enquiry Form (WEN)**: This module describes the purpose of the Waste Enquiry Form (WEN) and how the form should be completed.

- **Completing the Waste Consignment Information Form (WCI) for Disposal / Supercompaction**: This module describes the purpose of the Waste Consignment Information Disposal and/or Supercompaction form and how to complete the form.

- **Completing the Waste Consignment Information Form (WCI) for Diversion**: This module defines what waste is, explains why we manage it, the legal framework, the classifications used in the Nuclear Industry, the Waste Hierarchy and the consequences of not managing waste correctly.

- **Introduction to Waste**: This module provides a more in-depth introduction to low level radioactive waste and how it should be managed.

Figure 8: Classroom modules available via the National Waste Programme

- **Waste Loading Plans**: This module provides information on the completion of Waste Loading Plans, including details of relevant national and international standards.

- **Characterisation Overview**: This module describes characterisation including its purpose, its value during the waste management lifecycle and the principles of how it is carried out.
9. Contacts

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