



**LOW LEVEL WASTE REPOSITORY GUIDANCE FOR THE
TRANSPORT OF VERY LOW LEVEL WASTE (VLLW)**

Summary

This Guidance Note is intended only to support the nominated Customer for VLLW projects by explaining the basis of the conditional requirements. Nothing in this Guidance Note shall be legally binding upon the Operator. In the event of any conflict between the provisions of the Guidance Note and any requirement in the Transport of Dangerous Goods and the Waste Acceptance Criteria (WAC) of the disposal site, the regulatory requirements and the WAC shall prevail in all aspects.

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Introduction:

This guidance note has been produced for Customers transporting Very Low Level Waste (VLLW) waste through the LLWR Waste Services Contract and its associated special conditions. For the purposes of this guidance note, the term VLLW is also considered to mean Lower Activity Low Level Waste (LA-LLW).

This guidance note does not cover the Waste Acceptance process for this service but focuses on LLWR Transport and Consignment Team's requirements for transport and consignment of the waste.

As defined in the Very Low Level Waste Disposal Special Conditions (WSC-CON-VSE) [1] under the Waste Services Contract, LLWR must provide the means of transportation for all VLLW and satisfy itself that the waste is prepared in accordance with good industry practice and consigned off the site in accordance with all relevant legislation, for example the Carriage of Dangerous Goods regulations [2].

LLWR have introduced three requirements to align to cover LLWR's responsibilities and align with the Waste Services Management Arrangements.

1. Consignment Requirement:

LLWR are the named Consignor of VLLW. However the LLWR arrangements allow the Customer / third party to consign on behalf of LLWR under their own arrangements after due diligence checks on the Customer / third party management arrangements have been completed by LLWR.

LLWR is required to carry out a level of due diligence to ensure adequate arrangements are in place. This assessment is carried out in two stages (detailed below) and requires the following to be completed:

- A questionnaire (RSF 06.18.03_01) to be completed by the Customer to list their management arrangements with regards to the classification, packaging and preparation for transport of VLLW. This should be completed at least 20 days prior to first shipment.
- A suitably qualified and experienced LLWR representative to attend the Customer's site prior to first shipment to witness the dispatch arrangements and sign off a Quality Plan with the customer, this is a mandatory requirement.
- Periodic site witnessing by an experienced LLWR representative.

The customer is required to supply LLWR with all documentation / evidence referenced with the completed questionnaire to enable LLWR to complete the review.

If the VLLW arrangements change following the completion of the initial questionnaire (i.e. change of wastestreams or package types) the Customer must re-submit an updated questionnaire. Copies of the new documentation must be sent to the LLWR DGSA for review / recording.

Witnessing of further shipments covered under the same Customer's Waste Enquiry, referenced in the questionnaire, is only required:

- In the instance a VLLW event occurs during a shipment at a Customer Site the next scheduled shipment is required to be witnessed.
- When concern is raised by the WLP assessor regarding the practicality of the proposed package / loading configuration as detailed within the WLP submission as supplied by the Customer.

A copy of the completed Quality Plan will be kept by the LLWR Consignment Team.

LLWR oversight will comprise of periodic witnessing or site provided evidence. The Customer could be requested by LLWR to provide photographic evidence prior to dispatch for certain loads within a schedule. Site periodic witnessing or provision of evidence will be agreed with the Customer.

2. Transport Requirement:

The transport for the consignments must be arranged under the LLWR transport services, the Customer is required to submit a transport enquiry to the Transport Services Team via e-Logistics with a schedule for multiple shipments (as required). This is a requirement of the Waste Services Contract.

NOTE: All VLLW shipments, even if exempt from the Carriage of Dangerous Goods Regulations, will be covered under the RADSAFE emergency response regulations. RADSAFE placards shall be applied to all VLLW conveyances.

3. Dispatch Requirement:

Prior to all shipment dispatches the Transport and Consignment Teams require the consignment information from the Customer. This information will be used to record the shipment under the LLWR arrangements

The information required is:

- Package identification and number of packages;
- Package activity / weight;
- Total conveyance activity / weight;
- Dangerous goods classification e.g. exempt / Class 7 excepted / LSA or other dangerous goods classes.

NOTE: The above information is covered in the WCI.

The information required on the day of dispatch is as follows:

- Copies of the monitoring certificates
- Copies of the transport documents (consignment notes) as applicable

All information on VLLW shipments should be directed to:

- E mails to: consignments@llwrsite.com



References

1. Very Low Level Waste Disposal Special Conditions (WSC-CON-VSE)
2. The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment regulation

