5 Written Arrangements for Non-Classified Persons Entering Controlled Areas

Scope

1. Where an employer has designated an area as a controlled area, IRR17 requires that they must not permit access to any non-classified person unless that person enters or remains in the area in accordance with suitable written arrangements. The purpose of this Chapter is to provide instruction and guidance on the requirements for such written arrangements for the entry of non-classified persons employed by the employer in question; non-classified employees of another employer; and, other persons (e.g. trainees and visitors).

2. The scope of this Chapter does not extend to the requirements for classified persons – the radiation protection adviser (RPA) is to be consulted for advice on such arrangements.

Statutory Requirements

3. In addition to the general requirements of the Health and Safety at Work etc. Act 1974 and the Management of Health and Safety at Work Regulations 1999 (MHSWR99), the following specific legislation applies directly: Ionising Radiations Regulations 2017 (IRR17).

Duties

4. Duties as detailed in Chapter 39 apply.

Non-Classified Persons

5. Non-classified persons for whom written arrangements are required may include the following:

a. employees over 18 years of age who work with ionising radiation but are unlikely to receive an effective dose exceeding 6 mSv or any of the other levels that would trigger the need for a person to be classified (see Chapter 38);

b. employees of another employer who are not classified and who are to work in the controlled area;

c. trainees (aged between 16 and 18 years) – such persons cannot become classified persons;

d. employees who do not normally work with ionising radiation;

e. persons under 16 years of age whether employees, trainees or visitors should be treated as ‘other persons’ below; and

f. other persons e.g. members of the public visiting the site.

Written Arrangements

6. Written arrangements are a set of arrangements laid down by the unit or establishment, in consultation with the RPA, to permit non-classified persons to enter a controlled area. IRR17 requires that the arrangements ensure that:

a. an employee or non-classified outside worker aged 18 years or over does not receive in any calendar year a cumulative dose of ionising radiation which would require that person to be designated as a classified person (see Chapter 38), or

b. in the case of a trainee or any other person, the person does not receive in any calendar year a dose of ionising radiation exceeding any relevant dose limit (see Annex E of Chapter 4).

7. Written arrangements may apply to a single person, process or controlled area or may apply to specific groups or types of person.

8. Non-classified persons must only be allowed conditional access to controlled areas – these conditions must be set out in the written arrangements. These written arrangements must be aimed at ensuring adequate restriction of exposure to ionising radiation (see Chapter 4) and may include close supervision, the use of personal protective equipment (PPE) and restrictions on the type of work being done or the time spent in the area. Detailed guidance on the content of written arrangements is set out at Annex A.

9. Written arrangements are to be incorporated into local orders (see Chapter 16).

10. Written arrangements are to be reviewed whenever:

a. there is a change to the details in the arrangements; and

b. the arrangements are found to be defective, for example by virtue of an individual reaching a maximum dose level allowed by the arrangements.

Dose Monitoring for Non-Classified Persons

11. It is a requirement of IRR17 that an employer who has designated a controlled area, shall not permit a person to enter or remain in such an area in accordance with written arrangements unless they can demonstrate by personal dose monitoring or other suitable measurements, that the doses are restricted in accordance with the written arrangements. It is essential that suitable estimates of dose are made for each individual – this will often be by the use of personal dosimetry but, where appropriate, may be made by other measurements such as area monitoring, or by use of a single electronic dosemeter held by one member of a group of people.

12. The employer must keep results of the monitoring or measurements and must make them available, at the request of the person to whom the monitoring or measurements relate. The employer is to review doses received by non-classified persons to ensure written arrangements are effective. MOD policy requires indefinite retention of these records.

Co-operation between employers

13. IRR17 requires that where work with ionising radiation undertaken by one employer is likely to give rise to the exposure to ionising radiation of the employees of another employer, the employers concerned shall co-operate by the exchange of information or otherwise to the extent necessary to ensure that each employer is enabled to comply with the regulations. Employers also have duties to co-operate under MHSWR99.

14. In the context of this Chapter, employers in control of the work area need information about the non-classified worker including dose history and training details. Dose information is to be passed between MOD employers using MOD Form FMed291D – Radiation Record Summary Card (available from Dstl Approved Dosimetry Service - see Chapter 6).

15. The employer of the non-classified person will need information in advance about the work to be done and estimates of the dose likely to arise from the work. Estimates of the dose actually received will be required on return of the employee. Detailed guidance on the information to be exchanged is at Annex B.

Records

16. Records should be kept in accordance with the requirements of Volume 1 Chapter 3 of this JSP and also JSP441 Defence Records Management Policy and Procedures. Reference copies of written arrangements are to be retained for a minimum period of 2 years after they are superseded. At the end of this period, an assessment on the relevance of retaining the document is to be made in accordance with MOD policy at Volume 1 Chapter 3. MOD policy requires records of monitoring data, relating to non-classified persons working under written arrangements, to be retained indefinitely.

Content of Written Arrangements

Introduction

1. Written arrangements are a set of arrangements laid down by the unit or establishment, in consultation with the RPA, to allow non-classified persons to enter controlled areas. The primary aim of such written arrangements is to ensure that any exposure is effectively restricted and under no circumstances exceeds a relevant dose level or limit for the individual concerned (see paragraph 10 of the main body of this Chapter).

2. Written arrangements need to be specific to the type of employee, trainee or other person to whom they relate and may need to be specific to the type of work or visit being undertaken. Thus, there may need to be more than one set of such written arrangements for a controlled area.

Content of Written Arrangements

3. Written arrangements are to contain the following information:

a. name and address of the unit or establishment;

b. details of controlled area(s) to which the arrangements apply;

c. details of date(s), time(s) or period(s) to which the arrangements apply;

d. details of type of person covered (e.g. trainee, visitor);

e. details of type of work (or visit) covered;

f. maximum cumulative dose(s) permitted – may also be specified in terms of maximum dose per entry, per shift, per week etc;

g. the means of assessing and monitoring personal dose to include both external and, where appropriate, internal dose;

h. investigation levels and procedures;

i. conditions for entry and working in the controlled areas e.g:

(1) prior training and information required;

(2) PPE;

(3) dosimetry;

(4) supervision;

(5) time to be spent in area;

(6) local orders and instructions to be complied with; and

(7) emergency arrangements.

j. special conditions and arrangements for sub-sets of individuals (e.g. requirements for pregnant or breast-feeding workers to inform local management) are to be stated and also any additional restrictions on the type of work they may carry out. In some cases, it may be more appropriate to have a separate set of written arrangements;

k. details of records to be made and retention periods; and

l. details of dose information to be provided to persons covered by the arrangements and their employers (if not own employee).

Information Exchange between Employers for a Non-Classified Employee Working with Ionising Radiation

Introduction

1. This Annex applies only where a non-classified employee is to be deployed to work in a controlled area of another employer (i.e. as a non-classified outside worker).

Duties of the Worker's Employer

2. Prior to commencement of radiation work, the employer is to:

a. obtain, from the operator of the controlled area, information about the radiological risks and dose estimates relevant to the work to be carried out;

b. obtain details of the written arrangements under which the employee will be working and consider whether these are adequate and acceptable – it may be appropriate to consult an RPA in this respect;

c. ensure that the employee is suitable to carry out the work, taking into account the type of work, the risks involved and the conditions under which the employee will be working;

d. obtain details of any special training that is required before arrival on site and information about training that is to be delivered by the operator of the controlled area;

e. provide the employee with the necessary information and training that the employee requires before arrival on site;

f. provide the operator of the controlled area with an estimate of the radiation dose received by the employee to date in the calendar year (if any), details of the employee's relevant training record and any other relevant particulars of the employee;

g. on return of the employee, the employer is to:

(1) ensure that the estimate of dose received by the employee is recorded and retained; and

(2) provide the employee with an estimate of the dose received if requested.

Duties of the Operator of the Controlled Area

3. Prior to commencement of the work in the controlled area, the operator is to:

a. provide the relevant information to the employer of the worker (see above);

b. ensure that the worker has received any specific training and information required for the work including training on the use of any PPE, emergency arrangements and information on the conditions, specified in the written arrangements, under which they are to work;

c. ensure that the worker remains suitable and fit to undertake the work;

d. during the period whilst the work is being carried out, the operator is to:

(1) ensure that the worker is supervised so that local orders and the written arrangements are complied with;

(2) conduct further information exchange with the worker's employer where any material circumstances of the work or the worker are likely to change or have changed; and

(3) make estimates of the dose received as specified in the written arrangements.

e. on completion of the work, the operator is to ensure that an estimate of the dose received is provided to the worker's employer and directly to the worker (if requested).