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## **The Environment Agency**

### **Amendment to industry requirements for ‘Corporate Radioactive Waste Adviser’ status**

**RPC rating: fit for purpose**

#### **Description of proposal**

The assessment outlines how the Environment Agency (EA) is revising guidance on the issuance of Corporate Radioactive Waste Adviser (CRWA) status to nuclear-related organisations. The status of CRWA is conferred upon a group of individuals who provide professional advice on managing radioactive waste within an organisation permitted to dispose of radioactive waste.

Currently, only nuclear operators who hold a permit, or have applied for a permit, can apply for CRWA status. Revisions to guidance would allow applications for CRWA status to be made by organisations that are considering building and operating nuclear power facilities. Revisions will allow applicants to obtain advice on plant design at an earlier stage, reducing uncertainty over regulatory requirements during the pre-application and permit application for, as well as the construction and operation of, nuclear sites.

#### **Impacts of proposal**

Based on its own sector knowledge, the regulator anticipates, over the next ten years, revisions would only affect two businesses. The assessment identifies that the additional cost to business is from maintaining CRWA status, prior to making a permit application. Based on the regulator’s industry knowledge, the assessment also states that this will require three days of a nuclear operator’s time and half a day of a regulator’s time. The regulator states that the typical daily rate of nuclear specialists is £325. The assessment estimates a total cost of maintaining CRWA status of £1600 per application, including regulator processing costs.

The EA states that, as the new approach is voluntary, businesses will apply for CRWA status only if they expect to receive a net benefit overall from a decrease in regulatory uncertainty.

No additional costs to businesses are identified in the assessment. The RPC verifies the estimated equivalent annual net direct cost to business (EANDCB) of £0.0 million.

## Quality of submission

The assessment explains sufficiently the rationale behind alterations to guidance, given the scale of changes.

In accounting for the cost to business, the assessment should not, however, have accounted for the cost borne by the Environment Agency itself. Future assessments should not include the cost incurred by public bodies in calculating the cost to business. In this assessment, their inclusion does not alter the EANDCB and the RPC is, therefore, able to validate, as presented, the cost to business.

The assessment could have been improved by further justifying figures used in the cost calculation. Further detail could have been provided on the length of time businesses devote to maintaining CRWA status and the wage rate of operators.

The assessment states that guidance updates followed “*an approach from business*”. The assessment would have benefitted from detailing the support from industry that the guidance changes received.

## Departmental assessment

Classification	Qualifying regulatory provision (IN)
Equivalent annual net direct cost to business (EANDCB)	£0.0 million
Business net present value	£0.0 million

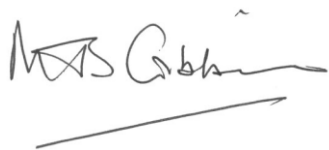
## RPC assessment<sup>1</sup>

Classification	Qualifying regulatory provision (IN)
EANDCB – RPC validated	£0.0 million
Business impact target score	£0.0 million

<sup>1</sup> For reporting purposes, the RPC validates EANDCB and BIT figures to the nearest £100,000

Opinion: EANDCB Validation  
Origin: Domestic  
RPC reference number: RPC-3728(1)-DEFRA-EA  
Date of implementation: 30/3/2017

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**Michael Gibbons CBE, Chairman**