

How to apply for an environmental permit

Form RSR-C3 – Variation to a bespoke radioactive substances activity permit (nuclear site, unsealed sources and radioactive waste)



Guidance notes

Please read these guidance notes carefully before you fill in the form.

Complete form RSR-C3 if your permit is for a radioactive substances activity involving unsealed sources and/or radioactive waste on a nuclear site, and you are applying to vary (change) the conditions or any other part of your permit. If you want to vary (change) the conditions relating to an existing disposal facility for solid radioactive waste, fill in form RSR-B5.

If you are applying to add an on-site radioactive waste disposal facility to a nuclear site that is already permitted, use form RSR-B5. If you wish to add other types of on-site radioactive waste disposal to a nuclear site permit (for example, in-situ disposal or disposal for a purpose), use form RSR-C5.

If you want to reduce the area of the site, as shown on the site plan included in your permit, you must apply for a partial surrender (using form RSR-E3, in preparation) rather than a variation.

You only need to give us details in this application for the parts of the permit that will be affected (for example, if you are adding a new radioactive substances activity or making changes to existing ones.)

For security reasons, applications to vary permits relating to sealed sources must be made separately using form RSR-C2.

Where you see the term 'document reference' on the form, give the document reference and send the document with the application form when you've completed it.

Contents

- 1 About the permit
- 2 About your proposed changes
- 3 How to contact us

1 About the permit

State the permit number (as shown on the front of your current permit) that this application relates to.

2 About your proposed changes

2a Type of variation

See our 'Environmental Permitting Charging Scheme and Guidance' available from our website: <https://www.gov.uk/government/publications/environmental-permitting-charging-scheme-2019> or later version.

If you are applying for an administrative variation, give details of the changes you want in the box provided and then you do not need to answer any further questions on form RSR-C3. Go on to complete form RSR-F.

For all other variations, go to question 2b and complete the rest of the form.

2b Changes to activities

If you want to add a radioactive substances activity that is not currently included on your permit (for example, if you want to start keeping and using mobile radioactive apparatus for environmental studies), tick the relevant 'add activity' box in Table 1.

If you want to remove a radioactive substances activity that is currently included on your permit (for example, if you want to stop keeping and using mobile radioactive apparatus for environmental studies), tick the relevant ‘delete activity’ box. Note that this is not the same as surrendering your permit and the permit will continue to apply to the areas of the site where the activity was carried out until a surrender is applied for and granted.

If you want to change a condition (including limits) in your permit, tick the “Affected by changes” “Yes” box against the activity that the condition relates to.

2c Details of the changes

2c.1 The items in Table 2 reflect the information required for a new permit application (see form RSR-B3 of the form and guidance). Tick the boxes to tell us which of those items are affected by the changes you are proposing to make if your variation application is granted.

Where changes may affect the impact of the radioactive discharges and disposals, significant from the point of view of health, to the water, soil or airspace of notifiable countries (Member States of the European Union and/or Norway), as described in the Transboundary Radioactive Contamination (England) Direction 2020, tick the “Yes” box on the appropriate line in Table 2 if:

- you are applying to increase your discharge or disposal limits; **and**,
- your activity is the:
 - operation of a nuclear reactor as described in paragraph 2(a) of the Direction, **or**
 - operation of a facility to reprocess irradiated nuclear fuel as described in paragraph 2(b) of the Direction, **or**
 - operation of other activities as described in paragraphs 2(c) to 2(i) and 2(k) of the Direction
- **and** your radiological risk assessment indicates that:
 - the local representative person would receive a radiation dose ≥ 10 μSv per year, **or**
 - there are exceptional pathways of exposure to EU Member States and/or Norway, e.g. involving the export of foodstuffs.

Otherwise, tick “No”. Also tick “No” if your application is for a military site or an activity that uses radioactive substances for military purposes.

With reference to activities 2(g) and 2(k), “industrial scale” and “industrial processing” are interpreted as meaning involving quantities of radioactive substances at or above the levels set out in Schedule 1 to the Radiation (Emergency Preparedness and Public Information) Regulations 2019. Where more than one radionuclide is involved, a sum of fractions approach should be taken to determine applicability.

2c.2 Provide details of your proposed changes to the activities, any new activities to be added, and your proposed changes to the permit, addressing how each of the applicable items in Table 2 is affected.

If you ticked “Yes” when asked about the Transboundary Radioactive Contamination (England) Direction 2020, your dose assessment should include:

Airborne effluents

Models, including where appropriate generic models, and parameter values used to calculate the consequences of the releases in the vicinity of the plant and for other affected Member States and/or Norway:

- atmospheric dispersion of the effluents
- ground deposition and re-suspension
- food chains, inhalation, external exposure etc.
- living habits (diet, exposure time etc.)

- other parameter values used in the calculations

Evaluation of concentration and exposure levels associated with the envisaged discharge limits:

- annual average concentrations of activity in the atmosphere near the ground and surface contamination levels, for the most exposed areas in the vicinity of the plant and in affected EU Member States and/or Norway
- for the reference group(s) in the vicinity of the plant and in affected EU Member States and/or Norway, corresponding annual exposure levels: effective dose to adults, children and infants, taking account of all significant exposure pathways

Liquid effluents

Models, including where appropriate generic models, and parameter values used to calculate the consequences of the releases in the vicinity of the plant and for other affected EU Member States and/or Norway:

- aquatic dispersion of the effluents
- their transfer by sedimentation and ion exchange
- food chains, inhalation of sea spray, external exposure etc.
- living habits (diet, exposure time etc.)
- other parameter values used in the calculations

Evaluation of concentration and exposure levels associated with the envisaged discharge limits:

- annual average concentrations of activity in surface waters, at the points where such concentrations are highest, in the vicinity of the plant and in affected EU Member States and/or Norway
- for the reference group(s) in the vicinity of the plant and in affected EU Member States and/or Norway: effective dose to adults, children and infants, taking account of all significant exposure pathways