

How to apply for an environmental permit (radioactive substances activity) The EP-RSR form (general) and Part RSR-A – About you and your premises



Guidance Notes

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

Contents

The EP-RSR form

Do you need to make an application?

Which parts of the form to fill in

Applications for sealed radioactive sources – national security requirements

Applications to transfer a permit

Supporting documents

Where to find the form and guidance

Contents, continued

Part RSR-A – About you and your premises

- 1 Site reference number
- 2 About you
- 3 Applications from an individual
- 4 Applications from an organisation of individuals
- 5 Applications from companies or limited liability partnerships (LLPs)
- 6 Applications from public or other corporate bodies
- 7 Your address
- 8 Contact details
- 9 The premises
- 10 Consultation
- 11 Justification
- 12 Your ability as an operator – management systems
- 13 Existing site contamination

The EP-RSR form

Do you need to make an application?

You don't need a permit to carry out a radioactive substances activity if there is a relevant radioactive substances exemption and you can comply with the conditions of the exemption. Further information can be found on GOV.UK:

www.gov.uk/government/collections/radioactive-substances-regulation-for-non-nuclear-sites.

Which parts of the form to fill in

The application form for radioactive substances activities is in several parts. You must fill in and send to us all relevant parts for each application you wish to make. Use the table below to select the relevant parts. There is a guidance note for each part, to help you fill it in.

Form part	Use this part:
RSR-A (about you and your premises)	For all applications – new permit, variation, transfer or surrender. Where applications for other types of Environmental permit are submitted by the same organisation for a single site at the same time, applicants may use the generic form 'Form EPA: Application for an environmental permit – Part A about you for all those applications'.
RSR-B1 (standard rules permit – sealed sources)	When: <ul style="list-style-type: none"> • you don't already have (see note 7) an environmental permit (see note 1) relating to sealed sources; • you want to keep or use sealed sources on a premises (see note 2); and • each source, and all sources taken together, fall within source category 5 (see note 3).
RSR-B2 (bespoke permit – sealed sources)	When: <ul style="list-style-type: none"> • you don't already have (see note 7) an environmental permit (see note 1) relating to sealed sources; and • you want to do one or more of: <ul style="list-style-type: none"> – keep or use category 1–4 sealed sources on a premises (see notes 2 and 3); – keep or use mobile radioactive apparatus in the form of sealed sources (any category); – receive, accumulate (see note 4) and/or dispose (see note 5) of waste sealed sources (any category). Or when:

	<ul style="list-style-type: none"> • you have (see note 7) an environmental permit (see note 1) relating to sealed sources; and • you want to make changes to it, such as: <ul style="list-style-type: none"> – altering the permitted number of sources held; – changing from a bespoke (see note 6) to a standard rules permit (or the other way around); – adding or deleting a radioactive substances activity (for example, disposal of waste sealed sources); – changing the place where mobile radioactive apparatus is normally kept when not in use (if the permit relates only to mobile radioactive apparatus).
RSR-B3 (bespoke permit – nuclear site, unsealed sources and radioactive waste)	<p>When:</p> <ul style="list-style-type: none"> • you don't already have (see note 7) an environmental permit (see note 1) relating to unsealed sources or radioactive waste; • you are, or plan to be, a nuclear site licensee or a tenant (see note 8) on a nuclear licensed site; and • you want to do one or more of: <ul style="list-style-type: none"> – keep or use unsealed sources on the site (see note 2); – receive or dispose (see note 5) of radioactive waste on or from the site (also see part RSR-B5); – keep or use mobile radioactive apparatus in the form of unsealed sources. <p>Or when:</p> <ul style="list-style-type: none"> • you already have (see note 7) an environmental permit (see note 1) relating to unsealed sources or radioactive waste and you want to make changes to it (unless these are solely in relation to disposal of solid, low-level radioactive waste in an engineered disposal facility on the premises), such as: <ul style="list-style-type: none"> – adding or deleting a radioactive substances activity (for example, keeping or use of mobile radioactive apparatus in the form of unsealed sources); – changing the permitted disposal routes or quantities.
RSR-B4 (bespoke permit – non-nuclear premises, unsealed sources and radioactive waste)	<p>When:</p> <ul style="list-style-type: none"> • you don't already have (see note 7) an environmental permit (see note 1) relating to unsealed sources or radioactive waste; • your premises are not on a nuclear licensed site; and • you want to do one or more of: <ul style="list-style-type: none"> – keep or use unsealed sources on the premises; – receive, accumulate or dispose (see note 5) of radioactive waste on or from the premises (unless this is solely in relation to disposal of solid, low-level radioactive waste in an engineered disposal facility on the premises) (also see part RSR-B5); – keep or use mobile radioactive apparatus in the form of unsealed sources. <p>Or when:</p> <ul style="list-style-type: none"> • your premises are not on a nuclear licensed site; • you have (see note 7) an environmental permit (see note 1) relating to unsealed sources or radioactive waste; and • you want to make changes to it (unless these are solely in relation to disposal of solid, low-level radioactive waste in an engineered disposal facility on the premises), such as: <ul style="list-style-type: none"> – adding or deleting a radioactive substances activity (for example, keeping or use of mobile radioactive apparatus in the form of unsealed sources); – changing the permitted disposal routes or quantities.
RSR-B5 (bespoke permit – on-site disposal of solid radioactive waste in an engineered disposal facility)	<p>When:</p> <ul style="list-style-type: none"> • you don't already have an environmental permit (see note 1) relating to unsealed sources or radioactive waste; and • you want to dispose of solid, low-level radioactive waste in an engineered disposal facility on your premises (includes conventional landfill sites and dedicated low-level radioactive waste landfill facilities, whether they are 'stand-alone' or part of a wider operation involving radioactive substances activities).
RSR-B6 (standard rules permit – radioactive waste from production of oil and gas)	<p>When:</p> <ul style="list-style-type: none"> • you don't already have (see note 7) an environmental permit (see note 1) relating to radioactive waste; and

	<ul style="list-style-type: none"> • you want to accumulate or dispose (see note 5) of radioactive waste, arising from the production of oil and gas, on or from your premises • you can comply with all the rules set out in Standard Rules SR2014 No 4
RSR-B7 (standard rules permit about the unintentional receipt of radioactive materials and waste)	<ul style="list-style-type: none"> • you don't already have an environmental permit (see note 1) relating to unsealed sources or radioactive waste; and • you want to accumulate or dispose of radioactive waste which you have received unintentionally • you can comply with all the rules set out in Standard Rules SR2017 No 1
RSR-D2 (transfer – sealed sources)	<p>When:</p> <ul style="list-style-type: none"> • you have an environmental permit (see note 1) relating to sealed sources; and • you want to transfer all or part of the permit to a different legal entity.
RSR-D3 (transfer – unsealed sources and radioactive waste)	<p>When:</p> <ul style="list-style-type: none"> • you have an environmental permit (see note 1) relating to unsealed sources or radioactive waste; and • you want to transfer all or part of the permit to a different legal entity.
RSR-E2 (surrender – sealed sources)	<p>When:</p> <ul style="list-style-type: none"> • you have an environmental permit (see note 1) relating to sealed sources; and • you want to surrender all or part of the permit.
RSR-E4 (surrender – non nuclear premises, unsealed sources and radioactive waste)	<p>When:</p> <ul style="list-style-type: none"> • your premises are not on a nuclear licensed site • you have an environmental permit (see note 1) relating to unsealed sources or radioactive waste (including on-site disposal of solid radioactive waste); and • you want to surrender all or part of the permit.

Note 1

This includes a registration or authorisation issued under the Radioactive Substances Act 1993 that became an environmental permit on the introduction of the Environmental Permitting Regulations 2010.

Note 2

A nuclear site licensee does not need an environmental permit to keep or use radioactive material on the site, but a tenant on a nuclear licensed site does.

Note 3

Category 5 sources are defined in 'How to apply for an environmental permit – Part RSR-B1'. Category 1–4 sources are all those not included in category 5.

Note 4

Neither a nuclear site licensee nor a tenant needs an environmental permit to accumulate radioactive waste on a nuclear licensed site.

Note 5

Disposal includes the transfer of radioactive waste to another person.

Note 6

This includes a 'fixed condition registration' issued under the Radioactive Substances Act 1993.

Note 7

If you already have an environmental permit (except for one that applies only to mobile radioactive apparatus) but wish to move your radioactive substances activities to a different premises, you will need to apply:

- to surrender your existing permit; and
- for a new permit to carry on radioactive substances activities at the new premises.

Note 8

A 'tenant' is an organisation, other than the holder of the nuclear site licence, carrying on a radioactive substances activity on a nuclear licensed site.

Note 9

When applying for a variation, you only need to tell us about those aspects you wish to change.

Applications for sealed radioactive sources – national security requirements

Generally, the Environmental Permitting Regulations (EP regulations) require applications and permits to be made publicly available. We cannot, for national security reasons, do this for applications and permits related to sealed radioactive sources.

This means you must make applications relating to sealed sources separately. So if, for example, you are applying for a new sealed source permit and a new unsealed source/radioactive waste permit at the same time, you will need to send us two separate parts RSR-A and two separate parts RSR-F, together with the appropriate parts RSR-B. This gives us two complete applications, only one of which we will make publicly available.

If your application relates to a permit for sealed radioactive sources, all parts of the form are sensitive documents in terms of national security. They are marked as 'OFFICIAL – SENSITIVE' and you must protect them in an appropriate manner.

- Do not copy them to other third parties without consulting the Environment Agency.
- Lock them in a cabinet or container when not in use.
- Make those who need to access the documents aware of the marking and the need to protect the information from unauthorised disclosure and loss.
- If you move them around, use a sealed envelope – do not mark the envelope 'Official Sensitive' or with any other marking, that might indicate its content. If you post them, use 'Royal Mail Special Delivery Next Day' service.
- Do not send them to us by email.

Applications to transfer a permit

The EP regulations require an application for a transfer to be made jointly by the transferor (the 'old operator') and the transferee (the 'new operator'). Both parties need to complete the declarations on part RSR-F of the form. Unless specifically stated otherwise (on the form or guidance), the information requested on the other parts of the form relates to the new operator.

Supporting documents

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

Where to find the form and guidance

You can find the application form parts, their associated guidance, and the other Environment Agency guidance documents they refer to, on GOV.UK.

- nuclear – www.gov.uk/government/collections/radioactive-substances-regulation-for-nuclear-sites
- non-nuclear – www.gov.uk/government/collections/radioactive-substances-regulation-for-non-nuclear-sites

Part RSR-A – About you and your premises

Complete part RSR-A for all applications relating to a radioactive substances activity.

Keep a copy of this part of the form once you have filled it in for the first time. You will be able to reuse it (amending it as appropriate) if you need to apply for a variation, transfer or surrender, or another radioactive substances activity permit.

1 Site reference number

This is a unique reference number given to your site (premises) by us. It is not a permit reference number. If you don't yet have, or don't know, your site reference number, leave this blank.

2 About you

Tick the box which describes you as an applicant.

3 Applications from an individual

Fill in your name.

4 Applications from an organisation of individuals

Note: Limited liability partnerships should complete question 5, not this question.

Tell us what type of organisation you are.

Fill in the name of the main representative of the organisation. Provide the names of the other members of the organisation on a separate sheet and tell us the document reference. (We can only issue permits to named individuals. We cannot, for example, issue a permit to a partnership. We therefore need the names of each person in the partnership (or at least five of the partners if there are more than five)).

5 Applications from companies or limited liability partnerships (LLPs)

Tell us your company/LLP name and its registration number (as registered at Companies House for UK companies).

6 Applications from public or other corporate bodies (see note below)

Tell us the type of organisation (for example, NHS trust, university) and its name. Also tell us the position of the person who acts as the secretary or clerk (for example, trust secretary, university registrar) – we will send formal correspondence to this person.

Note: In very particular circumstances (see regulatory guidance note number RSR 3 (version 2)), it may be possible for two or more companies, LLPs or other bodies to make a joint application. In this case, provide the details of the additional bodies on a separate sheet.

7 Your address

All applicants must give us their main business address.

- For a company or LLP, this is the registered office address (as registered at Companies House for UK companies). For a company, give the email address of the company secretary and, for an LLP, that of a designated member – we will send formal correspondence to this person.
- For a public or corporate body, this is the address of the principal place of business (this is usually where the executive head of the organisation is based). Give the email address of the secretary or clerk.

For a company or LLP, also give us your main UK business address if it is different from your registered office address; for example, if the company is registered overseas. Also tell us the position of the most senior person at this address – we will send formal correspondence to this person.

8 Contact details

We need the names and details of members of your organisation (or your agents) to help us deal with your application quickly and efficiently. The people you name should have the authority to act on your behalf. We need details of the people who:

- put the application together;
- manage the radioactive substances activities on a day-to-day basis (or a nominated operational contact for a large facility);
- we can contact about payment of fees and charges.

9 The premises

9a What is the name and address of the premises where you intend to carry out a radioactive substances activity?

Give the full address of the premises – post office box numbers alone are not acceptable. Include a postcode where there is one that relates to the geographic location of the premises (that is, not a postcode relating to a box number).

You will need a separate permit for each premises where you carry out a radioactive substances activity. What might be considered as a single premises is not always clear-cut (for example, where a number of nearby buildings are involved that are separated by public roads or other land). We will normally consider a group of buildings and/or areas of land to be a single premises where:

- they are in reasonable proximity (usually within a few hundred metres, whether or not separated by public roads);
- they can reasonably be regarded as part of the same unit; and
- a common management system is applied to the activities carried out in them.

Please contact us to discuss your particular circumstances.

If you only keep and use mobile radioactive apparatus, give details of the premises where that apparatus is normally kept when not in use. You will need a separate permit for each premises where mobile radioactive apparatus is normally kept when not in use. But you don't need a separate permit where your mobile radioactive apparatus is temporarily kept on other premises:

- (yours or a third party's) for the duration of work you are carrying out on those premises; or
- under your control (premises B) for the duration of work you are carrying out on some other premises (premises C), where premises B provides more secure storage than would be available at premises C, and is geographically more convenient for access to premises C than the premises where you normally keep the mobile radioactive apparatus.

If you are making a single application to keep and use both sealed sources and mobile radioactive apparatus (in the form of sealed sources), the premises where the apparatus is normally kept when not in use must be the same as that where you keep and use the sealed sources.

National Grid Reference for the premises

Provide the 12-character Ordnance Survey National Grid Reference for the centre of the site; for example, AB 12340 56780. You can find your grid reference on this website: www.ukgr.dreamhosters.com.

9b Is a nuclear site licence under section 1 of the Nuclear Installations Act 1965 needed for the premises?

Tell us if the premises is, or is part of, a nuclear licensed site. (Tick 'yes' if an application for a licence has been made but not yet granted.) If it is, tell us whether you are the licensee (or potential licensee) or a tenant (see note 8 on page 3). (Licensees and tenants are exempted from the need for an environmental permit for certain radioactive substances activities.)

9c Provide a plan of the site (marking the site boundary in green)

You don't need to provide a site plan if:

- you are applying for a standard rules permit about the unintentional receipt of radioactive materials and waste; or
- you are applying for a full surrender of your permit; or
- your permit already includes a site plan and you are applying for a variation or full transfer that doesn't involve any change to the site boundary.

Where your only activity is the keeping and use of mobile radioactive apparatus you should send us a plan that shows the premises where that apparatus is normally kept when not in use.

Otherwise, you must send us a site plan that identifies all of the land on which your radioactive substances activities will take place (the 'site') and its geographical location (for example, by identifying nearby roads or other landmarks). If you are applying for a partial transfer, you need to provide two site plans – one showing the extent of the radioactive substances activities to be carried out by the transferor, and one showing the extent of the radioactive substances activities to be carried out by the transferee, following the partial transfer.

The site will normally include all the land within the boundary of the premises, together with any systems used for the disposal of radioactive waste that extend beyond the normally-recognised premises boundary (such as sea pipelines or drains up to their discharge into public sewers).

If your radioactive substances activities are confined to a limited part of the premises (for example, a single building on a large university campus), you may choose to include only that part within the site plan. But you must ensure you include, as appropriate, all areas:

- where you receive, store or use radioactive materials;
- where you receive, accumulate or dispose of radioactive waste;
- used to move radioactive materials or waste around the premises;
- where supporting activities covered by permit conditions (such as record keeping) are carried out.

If you choose this option, you will need to apply for a variation before using any other part of the premises for a radioactive substances activity at a later date. The site plan should include:

- whole buildings rather than parts of buildings (except where a discrete premises is 'semi-detached' or part of a terrace);
- the 'footprint' of any multi-storey building that is used or partially used for the carrying on of your radioactive substances activities (even if shared with other organisations).

If there are buildings or areas of land within your site that are not used for your radioactive substances activities and are not under your control (for example, on a joint hospital and university campus), you may show them as a hatched area on the site plan. In the case of a premises consisting of physically separate buildings/areas of land, as discussed at 9a above, the site plan may consist of a number of non-contiguous areas.

If all or part of the premises you use for a radioactive substances activity is also used by another organisation for a radioactive substances permitted activity, it should be included within the permitted area and the way the radioactivity is controlled must be fully described in the written management system.

In general, the only detail that is required is the site boundary – there is no need to show individual buildings, drain runs, and so on, within the boundary. You should show any public roads that cross the site. You may show any drains and pipelines that extend beyond the normally-recognised premises boundary as a line.

If you want to reduce the area shown on the site plan included in your permit, you will need to apply for a partial surrender and satisfy us that you have avoided pollution or returned that part of the site to a satisfactory state. We cannot do this as a variation.

Copyright issue

Please note that some plans and maps will have copyright issues. Unless you are using your own maps or plans or have paid for the copyright (for example with Ordnance Survey) you may not have the right to reproduce the map or plan.

10 Consultation

We need to consult with, or provide information to, the right authorities, when appropriate.

All applicants should tell us which local authority area the premises are in. This is the district council, borough council, city council, metropolitan district council, London borough or other unitary authority.

Also tell us who the sewerage undertaker for the premises is, unless:

- you are only applying for a standard permit; or
- your premises are on a nuclear licensed site and you don't discharge radioactive waste to public sewer.

11 Justification

We can only issue a permit for a radioactive substances activity that relates to a ‘justified practice’ or work not subject to the requirement for justification. Decisions on whether a practice is justified are made by Government and further information can be found on GOV.UK: www.gov.uk/guidance/guidance-for-operators-of-new-nuclear-power-stations (click on ‘Regulatory Justification’) www.gov.uk/government/publications/the-justification-of-practices-involving-ionising-radiation-regulations-2004-guidance-on-their-application-and-administration. You should not make an application if the Justifying Authority has determined your practice is not justified.

We need to know whether you are carrying out:

- **an existing practice** (that is, a practice of a class or type that was carried out in the UK prior to 13 May 2000, as listed in Annex 3 of the Government guidance on justification, The Justification of Practices Involving Ionising Radiation Regulations 2004; Guidance on their application and administration);
- **work not subject to the requirement for justification** (most examples of this are listed at question 11b on the application form);
- **a new practice determined to be justified** (that is, a practice of a class or type that was introduced after 13 May 2000 and is recorded as justified on the Register of Justified Practices required under the Regulations);
- **a new practice currently being considered by the Justifying Authority** (we will begin work on determining your application but we will not issue a permit before a decision on justification is made and then only if the decision is positive. We will not refund any fees or charges if we are unable to issue a permit).

If you are carrying out an existing practice, tell us its number and purpose as set out in the first column of the table in Annex 3 of the Government guidance. Also, tick the relevant ‘associated activities’ boxes – we need this additional detail because of the wide scope of some practices.

12 Your ability as an operator – management systems

Don’t answer this if you only need a standard permit or are applying to surrender your permit.

You must have an effective, written management system in place to achieve compliance with the conditions of any permit we may issue to you. You must send us a summary of your management system or, if you are a nuclear site licensee, your management prospectus.

We have provided guidance on management systems in:

- Radioactive substances regulation: management arrangements at nuclear sites (www.gov.uk/government/publications/rsr-management-arrangements-for-nuclear-sites)
- Guidance on the production and use of an integrated management prospectus (www.gov.uk/government/publications/integrated-management-prospectus-for-nuclear-licensed-sites)
- our non-nuclear ‘How to comply’ guidance available at: www.gov.uk/government/collections/radioactive-substances-regulation-for-non-nuclear-sites

Tell us whether your management system is accredited and under what scheme or standard.

13 Existing site contamination

If you are applying for a new permit, for premises not on a nuclear site, and are aware that previous use of radioactive substances on the site has left a legacy of land or groundwater contamination, you should provide details of what contamination is present.

This is because, when you surrender your permit, you will need to demonstrate that all necessary measures have been taken to return the site to a satisfactory state, having regard to the state of the site before the facility was put into operation.