

HASS and Source Security

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NPL

1 Objectives

Familiarisation with likely:

- HASS regulations
- Statutory security regime
- Caution: the final regulations may be different from the consultation draft.

2 HASS

Defra consultation:

- Finishes 17 June
- Implementing 2003/122/EURATOM
- Still significant uncertainty over detailed requirements
- Staged implementation from October 2005 to January 2008

3 HASS

Principal features of HASS regime:

- Cradle to grave approach to control of sources
- Notification of transfer of HASS
- Maintenance of a national register of HASS
- Pre-registration inspection visits by Environment Agency Inspector
- Financial provision for disused HASS

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4 HASS

Principal features continued:

- Plan for disposal/transfer of disused HASS
- Source user dependant on Manufacturer or Supplier to provide basic information.
- Manufacturers will have special responsibilities
- Charging scheme
- Provision to recover orphan sources

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5 HASS

In practice HASS is likely to mean:

- New RSA 93 application forms
- New registrations with new conditions, designed to be enforceable
- New guidance on application for registrations and on expectations of users

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6 HASS

In practice HASS is likely to mean:

- Management conditions in registrations
- Supply of specified records to Environment Agency within a period, probably 2 weeks

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7 Security

Statutory security regime for:

- HASS
- Similar level of potential danger to human health or the environment, or similar wording

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8 Security

Statutory regime likely to involve:

- Obligation to provide security features to published standards if reasonably practicable
- Security standards likely to be based on IAEA TECDOCS 1344 and 1355 - risk based
- Consideration of aggregations of smaller sources
- Charging scheme

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9 Security

In practice security is likely to mean:

- Publication of security standards based on IAEA and replacing the current ACPO guidance
- Additional conditions in registrations, including improvement conditions
- Pre-registration inspection visits by the local Police

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10 Security

In practice security is likely to mean:

- Duty of Environment Agency to take advice from police
- Possibility of enforcement action on security conditions
- Categorisation of sources and groups of sources by IAEA category