



University of Sussex

Environmental Permitting Regulations 2010

Compliance Document and Operator's Procedures for Sealed and Open Sources

EPR2011 Compliance Document and Operator's Procedures –Sealed and Open Sources

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1. Endorsement

The University of Sussex will comply with the conditions attached to both the University's permit to use radioactive material in the form of open sources and to accumulate and dispose of radioactive waste, and the permit to use radioactive material in the form of sealed sources containing specified radionuclides in carrying out specified practices on the premises. This document and associated supporting documents have been formulated to enable the University to fulfil these conditions through a clear management structure and defined roles and responsibilities of those involved.

This management document will be reviewed regularly and revised whenever significant changes are necessary due to changes in legislation, guidance or activities within schools.

Signature



2.6.2014

Vice-Chancellor

2. Compliance Statement

The University of Sussex is committed to achieving compliance with the Environmental Permitting (England and Wales) Regulations 2010 and will, so far as is reasonably practicable, protect employees, members of the public and the environment from its activities involving the use of radioactive substances.

The University has appointed competent persons to assist in the discharge of its statutory duties under the EPR 2010 as detailed in section 4. "Responsibilities", in particular a qualified expert to advise on all aspects of EPR and RSR compliance and suitably qualified staff to supervise and undertake the duties required to achieve compliance with the conditions set out in the permits.

3. Responsibilities under EPR2010

3.1 University Council

The University Council is responsible for ensuring that overall management arrangements will meet the requirements of EPR 2010.

3.2 Vice-Chancellor

The Vice Chancellor is responsible for implementation of the University's Health and Safety Policy and as the most senior manager of the University is identified as the Operator under EPR 2010 and is therefore responsible for ensuring overall compliance with EPR 2010.

3.3 Heads of School

Heads of School are responsible for the implementation of EPR 2010 Operator Procedures within their schools, appointing any necessary Radiation Protection Supervisors in writing and for ensuring the provision of adequate resources to fulfil statutory requirements and university policy.

3.4 Heads of Department / Clinical Director

Heads of Department are responsible for ensuring that departmental staff under their management control, including faculty staff, technicians, students and visiting academics/researchers who use radioactive substances comply with EPR 2010 by following the relevant Operator procedures.

3.5 Director of Estate Services

The Director of Estate Services is responsible for the provision of the University Radiation Protection Service (URPS) which is managed by the University Radiation Protection Officer.

3.6 University Radiation Protection Service/University Radiation Protection Officer

The University Radiation Protection Service (URPS) is provided through the service level agreement with Sussex Estates and Facilities LLP (SEF), and is managed by

the University Radiation Protection Officer (URPO). The SEF QSHE and Compliance Manager will fulfil the functions of the URPO.

The URPO shall:

- Liaise with the Environment Agency on behalf of the Operator on all matters relating to EPR2010, including applications for permits and variations, the annual Pollution Inventory return and reporting breaches and any other notifiable occurrences.
- Liaise with the appointed Radiation Protection Adviser with regard to risk assessments, including risk assessments for new and expectant mothers, dosimetry requirements and the design and commissioning or alteration of radiation facilities.
- Supervise the training and licensing of radiation workers and other people with duties under these operating procedures.
- Liaise with University appointed Radiation Protection Supervisors and ensure that local operating procedures are developed to fulfil the requirements of these procedures.
- Perform regular inspections of radiation facilities and report deficiencies to the relevant school and the Radiation protection Committee.
- Organise and deliver an emergency response for all radiation emergencies occurring upon the campus.
- Maintain all necessary records for statutory compliance.

3.7 Radiation Protection Supervisors

Heads of School must appoint a Radiation Protection Supervisor (RPS) to oversee all work with ionising radiations within their school. The RPS is responsible for the authorisation of purchases of radioactive substances, maintenance of local records required by EPR2010, overseeing the accumulation and transfer of solid and organic liquid waste to the radioactive waste decay store and the disposal of aqueous waste. They will also be required to assist the RPO in the event of any emergency involving ionising radiations on the campus.

3.8 Sussex Estates and Facilities LLP

Sussex Estates and Facilities LLP (SEF) is responsible for implementing procedures to ensure that all work areas where radioactive materials are used follow the Environment Agency guidance on the design of radiation facilities and meet the standards required under EPR2010. To achieve this SEF is required to consult with the Radiation Protection Advisor (RPA) on behalf of the Operator, at the planning stage, for advice on best practice including design, fixtures, fittings and security. SEF must ensure sufficient on-going consultation with the RPA to ensure new or refurbished radiation work areas are completed and handed over in a condition that satisfies statutory requirements.

3.9 Principal Investigators/Research Team Leaders

Principal Investigators/Research Team Leaders are responsible for the supervision and safety of radiation workers engaged on projects involving ionising radiations and must ensure that radiation workers adhere to the relevant operator procedures. They are also responsible for the use, storage and disposal of radioactive substances used within their areas of control.

3.10 Head of Radiography

The Head of Radiography for the Clinical Imaging Science Centre is responsible for the supervision and safety of radiographers working under their control and must ensure that radiographers adhere to the relevant operator procedures. They are also responsible for the use, storage, security and disposal of radioactive substances used within their areas of control.

3.11 Radiation workers/Radiographers

Are responsible for ensuring that they adhere to these procedures and any local operating procedures, in particular procedures for the ordering and acquisition of radioactive substances, keeping required records and accumulation and disposal of radioactive waste. They must also report any discrepancies or deficiencies to the local RPS.

