

Our Ref: LB/YM/RSA/E/20086  
Your Ref:

Radiation Protection Officer  
University of Dundee Safety Services  
3 Cross Row  
Dundee  
DD1 4HR  
FAO Martin Rollo



If telephoning ask for:  
Louise Brown

6 June 2011

Dear Martin

**Radioactive Substances Act 1993: University of Dundee - Routine Inspection  
Certificates RSA/B/0070179, RSA/C/0070130 and RSA/C/0070092**

Thank you for your assistance during my recent inspection of the University of Dundee Main Campus on 18-19 May. I found the University to be in compliance with the requirements of the RSA93 certificates, and that the recommendations made at my last visit had been implemented. I note below some of the observations made during my visit which may help improve or more clearly demonstrate compliance, and responses to some of the issues discussed during the visit.

1. MRC staff working in JBC Mezzanine currently have 'visiting worker' status (as per current Health and Safety Management Agreement), such that these staff work in areas controlled by the University under the conditions of the University's RSA93 certificates, and any breaches of the RSA licence limits or conditions caused by them would result in enforcement action being taken on the University. As both the University and the MRC now hold RSA93 certificates which entitle them to keep, use and dispose of radioactive substances throughout the MSI/WTB/JBC complex (in contrast to the MRC's previous restriction to MSI 1 and JBC 3), both organisations should consider whether they are still content for 'visiting worker' status to be conferred on these staff in the management of radioactive substances. In the first instance, I would be grateful if you could

- (i) provide confirmation of the current arrangements (ie a current list of the areas MRC are responsible for with regard to RSA93, which areas the University are responsible for, any 'joint' areas, and areas where 'visiting worker' arrangements are in place), and
- (ii) clarify both organisations are content with their respective responsibilities under RSA93, in particular where 'visiting worker' arrangements are in place.

SEPA accepts that there may be good practical reasons where staff may require to work in this way (eg using a shared resource), and will keep these arrangements under review.

2. It was noted that not all finished stocks had been removed from the RIMS active stock list; this led to some confusion at inspection where not all apparently active stocks could be traced to a stock vial or samples, or a recently-completed use/disposal sheet) in the active use/disposal folder. Typically, paper records demonstrated that the 'missing' stock had been disposed of, but had not been recorded in this part of RIMS. If this list is to be used as the record of radioactive material required by Conditions 3.4.1.1 -3.4.1.6 of the registration, it should be kept as up to date as practicable – where historical practices make it difficult to update RIMS in this way (eg WTB Mez), a separate stock sheet based on current active use/disposal records could be maintained.

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Chairman  
David Sigsworth

Chief Executive  
Dr Campbell Gemmell

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Radiation Protection Officer  
University of Dundee

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3. The source of the waste in Workstation 2 in the WTB Mezzanine area should be established, and if necessary, users reminded of any procedures for commencing work in this area.
4. The return of the Na-22 stock from DEEP to stores was recorded as a 'disposal'. As the substance is not waste, such movements of the stock should in future be recorded as transfers, to avoid confusion.
5. Use of sharps bins in the Lilley lab for disposal of radioactive waste should be reviewed. If these bins are not used, they should be disposed of.
6. The status of the uranium and thorium salts kept in the waste store should be established. Should any of these be declared waste, they would require to be disposed of in accordance with the relevant legislation, which, depending on activities and quantities, may include RSA93 and/or associated exemption orders, and the Waste (Scotland) Regulations 2011. Please contact me should you have any queries in this regard.
7. The issue of preservation of records made in respect of RSA93 compliance was raised. As detailed in Condition 3.4.2 of the Registration and 2.9.1 of the Authorisation, records should be kept on site for one year after they are made, and preserved for a minimum of five years.
8. You advised an extension to WTB is being considered, which may contain a lab for radioisotope work. I would note that any radioisotope work undertaken in the new building would likely require an amendment to the RSA93 certificates, as the extension is not covered by the description of the Registered Premises as given in Schedules 1 and 4 of the Registration (1 and 13 of the Authorisation). I will be happy to discuss this issue when plans for the new building become clearer.

I attach for information a copy of your Operator Performance Appraisal which I describe in brief below.

SEPA is required to direct resources to where they are most needed and where they will be most effective in meeting its environmental objectives. SEPA has adopted a risk-based assessment methodology to determine inspection frequencies for licenses, authorisations and consents (where inspection is needed). The system used for RSA premises, i.e. those registered and authorised under the Radioactive Substances Act 1993 is called Operator Performance Assessment (OPA).



The objective of the OPA score is to identify which sites are poor performers in order that regulatory effort can be targeted appropriately. Comparison of overall site and component scores may provide valuable information as regards trends, deteriorating or improving performance year on year. The inspecting officer must use his or her own judgement, based on a thorough knowledge of the environmental issues pertinent to the keeping and use of radioactive material and/or accumulation and disposal of radioactive waste, to make an informed decision on the score to be awarded.

The attributes have been selected by an examination of the conditions and limitations within the certificate templates for registration and for authorisation to accumulate and dispose of radioactive waste. They are essentially broad categories into which the conditions will generally fall. It should be noted that where the term "radioactive substance" is used, it includes both radioactive material and radioactive waste, as appropriate.

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RSA-F-06

**RADIOACTIVE SUBSTANCES OPERATOR PERFORMANCE ASSESSMENT**

Form Ref ERA-F-06		
Radio Active Substances Operator Performance Assessment		
Licence No	Location Code	Officer / Team Area
RSA/B/0070179 (s13/14) RSA/C/0070130 (S7 open) RSA/C/0070092 (S7 closed)	331191	Louise Brown
Site Name	Site Address	Date of Assessment
University of Dundee	University of Dundee Nethergate Dundee DD1 4HN	18 -19 May 2011
Overall Comments:		
The university complies well with the requirements of its RSA93 certificates.		
Attribute	Score 1-5 1 = Poor 5 = Excellent	Comment / Explanation
1. Radioactive substance security	4	All areas where radioactive substances are kept or used have appropriate levels of security. CTSA requirements for HASS are met
2. Knowledge & implementation of licence requirements	4	Licence requirements implemented satisfactorily. Good knowledge of requirements demonstrated.
3. Recording & Use of Information	4	Records are generally well-kept and used to demonstrate compliance with RSA93
4. Facility Management	4	Premises and associated equipment satisfactory. Regular audits carried out by RPS's/ safety services
5. Radioactive substance management	4	Satisfactory RS management observed
6. Incidents complaints & non compliance events	3	None reported
Operator Performance Rating (6-30)	23	
Satisfactory / Unsatisfactory	Satisfactory	
Officers signature	Line Managers Signature	
		



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University of Dundee

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An assessment of your performance has been carried out and the outcome was satisfactory. The results have been recorded in the attached form.

I would be grateful if you would also pass on my thanks to your colleagues in all departments for their assistance during the inspection. Should you have any queries on any of the issues raised above, I can be contacted directly on 01355 575660 or by email at [louise.brown@sepa.org.uk](mailto:louise.brown@sepa.org.uk).

Yours sincerely



Louise Brown  
RS Specialist

Enc. OPA 2011

