

**Administrative arrangements to achieve similar controls to those under The  
Environmental Permitting Regulations (England and Wales) Regulations  
2016**

**Compilation of Environment Agency  
Requirements, Approvals and Specifications**

made under

**Approval Number EPR/LB3730DK**

Issued to

**Secretary of State for Defence**

for the

**Receipt and Disposal of Radioactive Waste from**

**HM Naval Base  
Devonport  
Plymouth  
PL2 2BG**

**Issue EPR2 Dated 08/03/2022**

**TABLE 1: CURRENT REQUIREMENTS**

<b>Permit condition</b>	<b>Requirement number</b>	<b>Effective Date</b>
Condition 2.4.1	2.4.1/v002	08/03/2022
Condition 2.6.2	None	
Condition 3.1.1	None	
Condition 3.1.4(a)	None	
Condition 3.1.8	3.1.8/v001	01/12/2014
Condition 3.2.1(b)	3.2.1(b)/v001	01/12/2014
Condition 3.2.1(c)	None	
Condition 3.2.3	3.2.3/v002	08/03/2022
Condition 3.2.4	3.2.4/v002	08/03/2022
Condition 3.2.5(a)	3.2.5(a)/v001	08/03/2022
Condition 3.2.5(b)	None	
Condition 4.1.1(d)	None	
Condition 4.1.2	4.1.2/v002	08/03/2022
Condition 4.2.2	4.2.2/P1/v002*	08/03/2022
Condition 4.2.2	4.2.2/P2/v002**	08/03/2022

\* part 1 (pollution inventory)

\*\* part 2 (other specifications)

Authorised .....Jane Longman.....

Authorised to sign on behalf of the Environment Agency

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## **Requirement number 2.4.1/v002**

### **Permit condition**

The operator shall complete the requirements specified in schedule 1 table S1.2 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.

### **Environment Agency Agreement**

The Environment Agency agrees a completion date of 31 March 2016 for requirement IC1 in Schedule 1 Table S1.2

The Environment Agency agrees a completion date of 30 June 2025 for requirement IC2 in Schedule 1 Table S1.2

## **Requirement number 3.1.8/v001**

### **Permit condition**

The operator shall, not later than 14 days after the end of each month or within such longer period as the Environment Agency may approve in writing, record all disposals of radioactive waste made during that month

### **Environment Agency Approval**

The Environment Agency notes that the Operator assesses and reports discharge of radioactive gaseous waste and radioactive waste to sewer on an annual basis and tracks disposals against reporting criteria on a quarterly basis. We also note that if disposal records are held onboard a deployed operational submarine then the appropriate disposal records will be updated as soon as reasonably practical upon the return of the submarine to HMNB Devonport.

## **Requirement number 3.2.1 (b) v001**

### **Permit condition**

The operator shall:

(b) unless otherwise agreed in writing by the Environment Agency:

- (i) define, document and carry out an environmental monitoring programme
- (ii) use the results of that programme to carry out an annual retrospective assessment of the dose to the representative person;

### **Environment Agency Agreement**

For 3.2.1(b)(i):

The Environment Agency agrees that the operator need not define, document or carry out an environmental monitoring programme.

The Environment Agency notes that the DRDL site operator is required by its own permit to carry out a programme of environmental monitoring around Devonport. The MoD undertakes additional monitoring but that is not related to this Approval.

## **Requirement number 3.2.3/v002**

### **Permit condition**

Monitoring equipment, techniques, personnel and organisations employed for the monitoring of disposals and the environment required by condition 3.2.1 or 3.2.5 shall have either MCERTS certification or MCERTS accreditation (as appropriate), where available, unless otherwise agreed in writing by the Environment Agency

### **Environment Agency Agreement**

The Environment Agency agrees that MCERTS certification or MCERTS accreditation (as appropriate) is not required for the following:

Monitoring of flow of discharge S1 to the sewer, due to the limited volume being discharged

Monitoring of flow of discharge W1 to the river, due to the limited volume being discharged

## **Requirement number 3.2.4/v002**

### **Permit condition**

Permanent means of access shall be provided to enable sampling and monitoring to be carried out in relation to the disposal outlets specified in schedule 3 unless otherwise agreed in writing by the Environment Agency

### **Environment Agency Agreement**

The Environment Agency agrees that permanent access is not required to the following outlets:

A1

S1

W1

## Requirement number 3.2.5(a)

### Permit condition

If required by the Environment Agency, the operator shall

- (a) take such samples and conduct such measurements, tests, surveys, analyses and calculations, including environmental measurements and assessments, at such times and using such methods and equipment as the Environment Agency specifies.

### Environment Agency Requirement

The Environment Agency requires the operator to:

Take, prepare and analyse “witnessed” samples of the type specified in Table 1 below and in accordance with the following:

- (a) The Operator is to take samples in the presence of a representative of the Agency’s contractor holding written authority from the Agency;
- (b) A request for taking witnessed samples shall normally be made by an Agency contractor at least ten days before the sample is taken. If the operator becomes aware subsequently of any circumstances which have resulted, or are expected to result, in preventing the taking of any sample as specified, he shall advise the Agency and the Agency’s contractor in writing and shall propose temporary alternative arrangements. These might include deferring the sample or taking an alternative sample appropriate to the relevant discharge route, and shall normally be implemented unless the Agency advises otherwise in writing;
- (c) The Operator shall prepare two nominally identical aliquots, each of the minimum volume specified in Table 1;
- (d) The Operator shall analyse one aliquot for the radionuclides or groups of radionuclides specified in Table 1, using the same techniques as those employed by the Operator to determine the activity of relevant radioactive waste disposals;
- (e) For the purposes of this paragraph, the Agency’s contractor is the UKHSA.

**Table 1: Required Witnessed Samples**

Sample Type	Frequency	Minimum Aliquot Volume <sup>(1)</sup>	Radionuclide or Group of Radionuclides
Spot sample of rainwater from any one of the sump pits below the Tidal X-berth effluent tanks.	Every 12 months (to coincide with witnessed sampling at the adjacent DRDL site)	1 litre	Tritium Cobalt-60 Gross beta-emitting radionuclides

<sup>(1)</sup> or volume which is reasonably practicable for retention

Note: the Environment Agency will review the continuing need for witnessed sampling after three years



## **Requirement number 4.1.2/v002**

### **Permit condition**

The operator shall keep on site all records, plans and the management system required by this permit, unless otherwise agreed in writing by the Environment Agency.

### **Environment Agency agreement**

The Environment Agency agrees that records, plans and the management system required by this permit may be held, in paper or electronic form, within the Naval Base document record room / archive system, off-site MOD document repository, or contracted document archive.

The Environment Agency agrees that some of the records required by the Approval will be retained onboard submarines and managed as ships' records, rather than being kept at HM Naval Base, and that copies of relevant ships records will be provided to the Naval Base at a frequency of not less than annually.

## Requirement number 4.2.2/P1/v002

### Permit condition

The operator shall supply such information in relation to:

- (a) the disposals of radioactive waste; and
- (b) the samples, tests, surveys, analysis and calculations, environmental monitoring and assessments undertaken under conditions 3.2.1 and 3.2.5 in relation to disposals of radioactive waste;

in such format and within such timescales as the Environment Agency may specify in writing.

### Environment Agency specification Part 1: Pollution Inventory

The Environment Agency specifies that:

1. The operator shall supply information relating to disposals of radioactive waste, taking account of the guidance provided in the Pollution Inventory Reporting Form for Radioactive Waste (available from [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/515793/LIT\\_7990.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/515793/LIT_7990.pdf)), and in accordance with the following:
  - (a) The information shall be provided not later than 28 February each year for disposals made during the preceding calendar year;
  - (b) The information shall be provided by:
    - (i) using our web-based reporting system (accessible from <https://piedc.environment-agency.gov.uk/piedc/piedc>); or
    - (ii) completing the Pollution Inventory Reporting Form Radioactive Waste (available from [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/515793/LIT\\_7990.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/515793/LIT_7990.pdf)) and e-mailing it to: [nrg.south@environment-agency.gov.uk](mailto:nrg.south@environment-agency.gov.uk) or posting a paper copy to:

Environment Agency  
Nuclear Regulation Group (South)  
Red Kite House  
Howbery Park  
Wallingford  
OX10 8BD

**In either case, the information identified in 'Part 5' [if present in these forms] is not required.**

- (c) The information provided on release quantities shall be the operator's best estimate achievable with the time and resources available. The operator is not required to perform additional monitoring, beyond any demanded by the permit, in order to complete the Reporting Form.

## Requirement number 4.2.2 Part 2/v002

### Permit condition

The operator shall supply such information in relation to:

- (a) the disposals of radioactive waste; and,
- (b) the samples, tests, surveys, analysis and calculations, environmental monitoring and assessments undertaken under conditions 3.2.1 and 3.2.5 in relation to disposals of radioactive waste

in such format and within such timescales as the Environment Agency may specify in writing.

### Environment Agency Specification Part 2: other specifications

1. The operator shall report information relating to waste disposals as specified in table 1 below, at the frequencies and within the timescales specified in that table, and in accordance with the following:
  - (a) Where components of a reportable quantity are Detection Limit figures, they shall be treated as positive data for the purposes of calculating the reportable quantity. However, where more than 50% of the value of the reportable quantity is due to components at the detection limit, it shall be reported as "less than" the calculated value. Where 50% or less of the value of the reportable quantity is due to components at the detection limit, it shall be reported as a positive result.
  - (b) For each reportable quantity marked with an asterisk in proformas 1a, 1b and 2, the operator shall highlight any reported value which exceeds the mean plus 3 standard deviations of the previous 12 reported values and, as far as reasonably practicable, provide an explanation for any such elevated value.

**Table 1 – Waste Disposal Information**

Information to be supplied	Frequency required	Date by which information is to be supplied
As specified in Proforma 1a - liquid effluent to river discharge return	quarterly	30 days after end of the calendar quarter when discharges made
As specified in Proforma 1a - liquid effluent to sewer discharge return	annually	30 days after the end of the calendar year when discharges made
As specified in Proforma 2 - gaseous effluent discharge return	annually	30 days after end of the calendar when discharges made
As specified in Proforma 3 – disposals of waste by transfer to other sites	annually	30 days after end of the calendar year when disposals made

NOTE 1:- Returns may be submitted using a format substantially similar to that shown in the relevant proforma.

NOTE 2:- if records are not complete due to a submarine being on deployment, full / amended records will be provided as soon as practicable upon return of submarine to HMNB Devonport.