

# **Supporting Information for the Joint Inutec Ltd and Magnox Ltd Environmental Permit Partial Transfer Application**

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Denise Cárdenas

September 2018

**Title** Supporting Information for the Inutec Ltd Environmental Permit Partial Transfer Application

**Customer**

**Customer reference**

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## REPORT HISTORY

Issue	Date	Description of Changes
Issue 1		Initial Issue to EA

## CONTENTS

1	GLOSSARY OF TERMS .....	5
2	INTRODUCTION/BACKGROUND .....	6
3	STATEMENT OF REQUIREMENT FOR JOINT PARTIAL PERMIT TRANSFER.....	7
4	STATUS OF NUCLEAR SITE LICENSING AND FREEHOLD ACQUISITION.....	7
5	INTERACTION OF INUTEC LTD AND MAGNOX POST INUTEC LICENSING.....	8
6	ENVIRONMENTAL MONITORING.....	8
7	CHANGE OF BOUNDARY ASSOCIATED WITH THIS PARTIAL PERMIT TRANSFER.....	9
8	RESUME OF RECENT PERMIT CHANGES ASSOCIATED WITH CHANGE OF ACTIVE LIQUID EFFLUENT DISPOSAL ROUTE FROM INUTEC WINFRITH .....	9
9	LIABILITIES TO BE ACQUIRED BY INUTEC LTD AS PART OF THE LAND AND FACILITIES ACQUISITION .....	9
10	DECOMMISSIONING AND LAND QUALITY MANAGEMENT PLANS....	9
11	MANAGEMENT OF SURFACE AND FOUL DRAINAGE .....	10
12	PROPOSED CHANGES TO THE INUTEC LTD AND MAGNOX LTD WINFRITH PERMITS.....	11
13	REFERENCES.....	11

**Figure 1 - Boundary of the new Inutec Ltd Permit Area - (A50) area to be transferred from Magnox Ltd Permit to Inutec Ltd Permit**

**Figure 2 – Magnox Ltd Permit Application Drawing**

## 1 GLOSSARY OF TERMS

EPR	Environmental Permitting Regulations
NDA	Nuclear Decommissioning Authority
MOD	Ministry of Defence
ONR	Office for Nuclear Regulation
EA	Environment Agency
WSSG	Winfrith Site Stakeholder Group
BEIS	Department for Business, Energy and Industrial Strategy
PAR	Project Assessment Report
SSHEQ	Safety, Security, Health, Environment and Quality
ADR	Accord Dangereaux Routier (The European Agreement Concerning the International Carriage of Dangerous Goods by Road)
SQEP	Suitably Qualified and Experienced Person
RSR	Radioactive Substances Regulation
ALES	Active Liquid Effluent System
VOCs	Volatile Organic Compounds
sVOCs	semi Volatile Organic Compounds
TPH	Total Petroleum Hydrocarbons
BTEX	Benzene, Toluene, Ethyl-Benzene and Xylene
PAH	Polycyclic Aromatic Hydrocarbons
WHO	World Health Organisation
GAC	Groundwater Acceptance Criteria
Zn	Zinc
Ni	Nickel
Cu	Copper
LQM	Land Quality Management
TI	Tradebe Inutec

## 2 INTRODUCTION/BACKGROUND

The information provided in this report is to support the joint application from Inutec Ltd and Magnox Ltd for the partial transfer of an EPR permit on the Winfrith Nuclear Licenced Site. This partial transfer is required as Inutec is purchasing the facilities and land (B4 area) it currently occupies as a tenant and some additional land (A50 area). Inutec Ltd will also become a Nuclear Site Licensee for the land it is acquiring.

Inutec Ltd through its various stages of ownership, i.e. UKAEA, AEA Technology Ltd, Waste Management Technology Ltd and Inutec Ltd, has been providing independent commercial radioactive waste treatment services, primarily to the UK nuclear industry and industrial radioactive waste producers for over 30 years. This includes waste from the decommissioning activities on the NDA Winfrith Site itself and from all the UK major nuclear waste producers including EDF, Magnox Ltd, the MOD (Dockyards and Aldermaston) and from a wide range of non-nuclear (small volume producer) customers including hospitals, universities, museums, schools, and other industrial users of radioactive materials. The strategic importance of Inutec as an independent radioactive waste service provider to the UK nuclear industry is well established and recognised by the industry, radioactive waste producers and the regulators.

Inutec's primary activity on the Winfrith Site is the import of radioactive waste, its processing and treatment and subsequent consignment to authorised waste disposal sites for disposal or for further treatment and disposal. The current Inutec Ltd operating facilities include but are not limited to:

- Analytical chemistry laboratories
- Research and process development laboratories
- Waste container import and export
- Waste sorting, segregation, decontamination, size reduction, treatment and packaging areas
- Waste container holding pending processing and waste disposal
- Process plant for volume reduction of waste
- Process plant for immobilisation or solidification of wastes
- Process plant for other physical, chemical and/or thermal treatment of wastes

Inutec Ltd was acquired in 2013 by Tradebe with the intent to develop the business on Winfrith Site into the long-term future. Given that the Winfrith NDA (Nuclear Decommissioning Authority) site is in the advanced stages of decommissioning and return to end state, primarily green field status by circa 2022/23, this has required Inutec to engage in the process of obtaining its own Nuclear Site Licence. A key element of being granted a nuclear site licence is demonstration of long term security of tenure either by a long-term lease or ownership of the land and facilities. Hence in parallel to the nuclear site licence application, Inutec has engaged with the NDA to purchase the land it currently rents from NDA via the site licensee (Magnox Ltd) (B4 Area) together with some additional land (A50 area) on the Winfrith licensed site.

Inutec through its various company ownerships has operated as a tenant on the Winfrith Nuclear Licenced site since 1996 formerly under its own RSA 93 authorisations and then under its own EPR permit (EPR/PP3890SE) since March 2011.

### **3 STATEMENT OF REQUIREMENT FOR JOINT PARTIAL PERMIT TRANSFER**

This joint partial EPR permit transfer application is submitted by Magnox Ltd and Inutec Ltd to enable the partial transfer of Magnox's EPR permit, as current Winfrith Nuclear Site Licence holder and Nuclear Operator, to Inutec Ltd as a newly granted Nuclear Site Licence holder. The new EPR permit which will be issued to Inutec Ltd at the same time that the Nuclear Site Licence is granted will include the area currently rented from Magnox (B4 area) covered by Inutec's existing EPR permit and the boundary of the A50 additional area.

The joint partial transfer application recognises that as part of the sale process, Inutec Ltd will be taking on the full liability for future decommissioning of the facilities and any future land remediation that is required within the Inutec Nuclear Licensed Site and return of the site to a delicensed and approved end state at some time in the future.

### **4 STATUS OF NUCLEAR SITE LICENSING AND FREEHOLD ACQUISITION**

The process of applying for the Inutec Ltd Nuclear Site Licence started in earnest at the beginning of 2014 and the formal application submission to ONR was made in April 2016. In parallel to this, Magnox Limited submitted an application for a change of their Winfrith Nuclear Site Licence to reflect the associated reduction in their Nuclear Licence Site boundary. Coordination meetings with Inutec, the regulators ONR and EA and other key stakeholders, Magnox and NDA have been held approximately on a quarterly basis to ensure good engagement with all interested parties. The progress on licensing, freehold and permitting activities has also been communicated to wider stakeholders through regular presentations at the 6 monthly Winfrith Site Stakeholder Group (WSSG) meetings.

As of the date of this partial permit transfer submission (September 2018), ONR have substantially completed their licence assessment and associated inspection regime and have stated that they are satisfied that Inutec Ltd is a suitable entity to be granted a Nuclear Site Licence, subject to confirmation of security of tenure and confirmation from BEIS that the required formal arrangements for Inutec's own Nuclear Liability Insurance are in place. The Secretary of State, with Treasury's consent, approved Inutec Ltd's proposed insurance arrangements, to cover its third party liabilities specified in section 19(1) of the Nuclear Installations Act 1965 on the 5<sup>th</sup> April 2018.

Prior to formal granting of the licence, ONR also attended an Inutec Ltd Board Meeting. The associated freehold sale process is progressing. Agreement has been reached on the financial transaction and the Heads of Terms have been agreed between NDA and Inutec Ltd. At the time of issue of this report, the sale contract and associated documentation has been signed by Inutec Ltd, NDA and Magnox. The current target date for exchange of contracts which provides the necessary confirmation of security of tenure to ONR is w/c 5<sup>th</sup> October 2018. Once this is obtained and readiness inspections are completed, ONR will produce their PAR (Project Assessment Report ONR-PAR-SDFW-16-13) which will form part of NDA's de-designation case which will be presented to BEIS to secure Ministerial approval for the sale. The expected timescales are:

- a) NDA submitted the de-designation business case in June 2018
- b) ONR to issue the PAR report (end November 18)
- c) 6 to 8 months to secure approval of business case by the Secretary of State including 90 days in the House of Commons library (January 2019 to March 2019)

It has been agreed by all stakeholders, ONR, EA, NDA, Magnox and Inutec that for planning purposes a realistic estimate for the granting of Inutec Ltd Nuclear Site Licence should be

aligned with point c above. The granting of the Nuclear Site Licence will also be subject to the approval of the joint partial permit transfer by EA.

## **5 INTERACTION OF INUTEC LTD AND MAGNOX POST INUTEC LICENSING**

Following Inutec Ltd becoming a Nuclear Site Licence Holder and taking ownership of the B4 and A50 land and facilities it will continue to buy in some services from Magnox for an interim period of several years as set out in new service level agreement. These include:

- Security arrangements and access to the site via the existing West Gate
- Perimeter fence security patrols and perimeter fence and boundary marker inspections
- Alarm monitoring (fire and building intruder alarms)
- Site access, security clearance and site pass issue
- Environmental monitoring (see Section 5)

Whilst Inutec Ltd continue to buy into the Magnox security arrangements, there will be no physical boundary (i.e. fencing) between the Inutec and Magnox licenced sites. The boundary between the site will be defined by marker posts until such time that Inutec becomes fully stand-alone from Magnox. Upon becoming a Nuclear Site Licensee, Inutec Ltd will be directly responsible for the sign off, of all Inutec waste import and export transport compliance documentation. This responsibility currently resides with Magnox as the site licensee. In practice, the preparation of the transport and waste compliance documentation is already managed by the Inutec Waste Compliance Team, the Team Leader of which reports to the Inutec SSHEQ Manager. Members of the waste compliance team have received the necessary ADR (Accord Dangereaux Routier, The European Agreement concerning the International Carriage of Dangerous Goods by Road) training and have been shadowing the Magnox Transport team as part of their training and competency requirements to ensure they are SQEP to take on the full responsibility for approval/sign off of all incoming and outgoing waste consignments.

With the changes in emergency arrangements on the Winfrith Site and in preparation for Inutec becoming a licensee, there has been a programme of emergency exercise training which has focussed on the Site Emergency Control Level which Inutec will be taking on in their own right as a licensee. Three of the exercises have been witnessed by ONR.

As a broader point on training in preparation for Inutec Ltd being granted its own licence, staff have and will be given further awareness training of the changes arising from granting of Inutec Ltd's Nuclear Site Licence.

## **6 ENVIRONMENTAL MONITORING**

Inutec currently operates as a tenant on the Winfrith Nuclear Licensed Site, the licence holder for which is Magnox Ltd. Under these arrangements, Inutec makes a financial contribution to the cost of the Winfrith Site environmental monitoring programme and this meets the Inutec environmental monitoring needs associated with its RSR permit. The intention is that Inutec will continue to buy into the Magnox Winfrith environmental monitoring programme as long as it is deemed to meet Inutec's requirements. Ultimately it is recognised that as the Magnox Winfrith Nuclear Licensed Site end state is approached, Inutec will put in place its own environmental monitoring programme.

As part of the application for a variation to the Inutec Winfrith permit in 2017 a review of Inutec's environmental monitoring requirements was undertaken [Section 13 Reference 1]. The review was undertaken with reference to EA's Radiological Monitoring Technical Guidance Note 2



[Section 13 Reference 2]. The review concluded that the current Magnox environmental monitoring programme continues to meet Inutec's requirements.

## **7 CHANGE OF BOUNDARY ASSOCIATED WITH THIS PARTIAL PERMIT TRANSFER**

The boundary of the land to be included in the new Inutec Ltd permit includes the area currently rented from Magnox (B4 area) covered by Inutec's existing EPR permit (EPR/PP3890SE) and the boundary of the A50 additional area as shown in Figure 1 on Page 12. The boundary of the land covered by the Magnox EPR permit (EPR/PB3898DC) will reflect the reduction in area due to the acquisition of land and associated facilities by Inutec Ltd. There will be no change in aqueous or aerial discharge limits for the Inutec Ltd permit or the Magnox Ltd permit associated with this partial transfer.

## **8 RESUME OF RECENT PERMIT CHANGES ASSOCIATED WITH CHANGE OF ACTIVE LIQUID EFFLUENT DISPOSAL ROUTE FROM INUTEC WINFRITH**

There have been several recent changes in the EPR/RSR permitting arrangements associated with the Inutec Winfrith, Magnox Winfrith, and Tradebe Fawley Sites. These have been required to enable the opening of a new active effluent disposal route due to the impending loss of Inutec access to the Winfrith Site ALES (Active Liquid Effluent System). This has included a variation to the Inutec Winfrith permit (EPR/PP3890SE), a variation to the Winfrith Magnox permit (EPR/PB3898DC), and the issue of a new RSR permit (VB399DC) and Water Quality Permit (EPR/GB3190VE) under Inutec Ltd at the Tradebe Fawley Site to enable the transfer of active effluent from Inutec Winfrith to Fawley for discharge to Southampton Water, together with the effluent from the Incinerator operations which is covered under a separate existing permit. The switchover of disposal route was successfully implemented in July 2018.

## **9 LIABILITIES TO BE ACQUIRED BY INUTEC LTD AS PART OF THE LAND AND FACILITIES ACQUISITION**

As part of the acquisition of the B4 and A50 land, Inutec Ltd will be taking ownership of all existing facilities, buildings and land liabilities and will therefore be responsible for all future decommissioning and land remediation. The only exception is that as part of Inutec's loss of access to ALES, whilst Inutec will take ownership of the B42 active effluent delay tanks, Magnox will be responsible for removing/remediation of the inner transfer pipeline from the B42 delay tanks to ALES across the land acquired by Inutec Ltd. Inutec Ltd recognise that as the future land owner of the B4 and A50 areas, under permitting regulations, Inutec Ltd will be responsible for any potential pollution arising from any operations carried out within the boundary of its environmental permit.

## **10 DECOMMISSIONING AND LAND QUALITY MANAGEMENT PLANS**

Part of Inutec Ltd's application for its Nuclear Site Licence, included the provision of information on future decommissioning and land quality management. The outline decommissioning plan was initially based on information that was provided by Magnox as part of their original decommissioning plans for the B4 and A50 areas. Subsequently, as part of the due diligence process for Inutec Ltd's purchase of the land and facilities from NDA, Inutec engaged RSK Consultants to undertake an independent decommissioning assessment to establish a plan and estimate the cost of the decommissioning works and associated waste management/disposal costs, including potential land remediation work [Section 13 Reference 3].

In parallel with this, an initial Land Quality Management Plan [Section 13 Reference 4] was submitted which was based on historic land quality monitoring of the overall Winfrith Nuclear Licensed Site including the B4 and A50 areas.

This did not identify any significant contamination across the wider site, however, the borehole sampling in the B4 and A50 areas was very limited (one borehole to the South East). To address this, a comprehensive borehole sampling and soil and groundwater analysis programme was initiated through RSK Environment Ltd. The borehole sampling exercise was undertaken in March 2017 and the associated report issued in July 2017 [Section 13 Reference 5].

A total of 16 boreholes across the B4 and A50 areas were drilled. Soil and groundwater samples were analysed for radioactivity by gamma spectrometry, gross alpha and beta and tritium, VOCs and sVOCs (Volatile Organic Compounds and semi Volatile Organic Compounds), TPH (Total Petroleum Hydrocarbons), BTEX (Benzene, Toluene, Ethyl-Benzene and Xylene), PAH (Polycyclic Aromatic Hydrocarbons), heavy metals and asbestos. Ground gas monitoring and testing was also carried out.

The report concluded that from the single round of borehole drilling and sampling of the site there is no significant soil or ground contamination present.

Radionuclide analysis - gross alpha and gross beta were below UK Drinking Water Standards of 1Bq/l and 0.5 Bq/l respectively except one sample which had a gross alpha of 1.4Bq/l and gross beta of 0.67 Bq/l

Tritium levels were all below the detection limit of 50Bq/l with the exception of one which was 110Bq/l. These are all well below the WHO (World Health Organisation) Guidance levels of 10,000 Bq/l.

There are some minor exceedances of metal concentrations (Zn, Ni and Cu) above the GAC (Groundwater Acceptance Criteria) values although generally marginal and with the exception of one sample for Zn, well below the UK Drinking Water Standard. A further confirmatory campaign of groundwater monitoring using the same boreholes was undertaken in August 2017 and this confirmed the initial conclusions.

The results from the monitoring campaigns referred to above have more recently been used to build on the initial Land Quality Management Report [Section 13 Reference 6] to prepare a Land Quality Safety Case [Section 13 Reference 7] and this provides additional information to fulfil the EA and ONR joint expectations on LQM [Section 13 Reference 7] and ONR's guidance on LQM [Section 13 Reference 8].

The report is a requirement of TI's LQM Strategy and Plan [Section 13 Reference 9] and will be a 'live' safety, health and environment management tool and subject to periodic review to take into account TI's evolving use of the land.

It also includes Inutec's forward programme on monitoring and surveillance and provides a checklist of points from ONR guidance on how any contaminated land that might rise should be managed.

## **11 MANAGEMENT OF SURFACE AND FOUL DRAINAGE**

The management of drainage including surface water and foul water for the B4 area under tenancing arrangements has been the responsibility of the landlord NDA and Site Licensee Magnox. When Inutec, becomes the owner of the land, Nuclear Site Licence holder and EPR permit holder as a Nuclear Site Licensee it will be fully responsible for the management of all drainage.

In 2017 as part of a planning application approved in April 2017 (Ref – 6/2016/0587, 'Continued use of land and buildings for radioactive waste management and operational development to include modification to the B4 complex and associated infrastructure for waste storage/treatment, rain and foul water drainage and extension to building B48', a detailed drainage study and report was undertaken. The final report [Section 13 Reference 10] was issued in September 2017 to satisfy one of the pre-operational planning conditions. This report details how the active, surface water and foul water drainage is managed currently and how it will be managed to meet the requirement for future developments approved in the planning permission.

## **12 PROPOSED CHANGES TO THE INUTEC LTD AND MAGNOX LTD WINFRITH PERMITS**

The only changes to Inutec Ltd permit (EPR/PP3890SE) and Magnox Ltd permit (EPR/PB3898DC) are the change in boundaries of the areas covered by each of the permits to reflect the change in land ownership to Inutec Ltd. There are no changes to the defined radioactive substances activities associated with the transfer of land ownership from Magnox Ltd to Inutec or any other permit conditions.

A systematic comparison has been made between the Winfrith Inutec Ltd RSR permit EPR/PP3890SE and the Winfrith Magnox Ltd RSR permit EPR/PB3898DC [Section 13 Reference 11].

Under the proposed new permit, Inutec Ltd will be operating as the licensee on its own Nuclear Licensed Site rather than as a tenant on the Magnox Nuclear Licenced Site under exiting permit (EPR/PP3890SEV005).

## **13 REFERENCES**

1. Review of Environmental Monitoring Requirements - Inutec Ltd, INUTEC(17)P018, October 2017
2. Radiological Monitoring Technical Guidance Note 2, December 2010, V1  
[https://www.sepa.org.uk/media/101506/radiological\\_monitoring\\_technical\\_guidance\\_note\\_2\\_environmental-radiological-monitoring.pdf](https://www.sepa.org.uk/media/101506/radiological_monitoring_technical_guidance_note_2_environmental-radiological-monitoring.pdf)
3. B4 Complex, Winfrith, Decommissioning Assessment, Project No. 810142, RSK, March 2017
4. Tradebe Inutec - Winfrith Land Quality Management, INUTEC(15)P022, Issue 2, May 2016
5. 'B4 Complex and A50 Area, Winfrith – Phase II Due Diligence Investigation and Planning Condition Support' – 810160 R1 (03), July 2017
6. Tradebe Inutec Winfrith – Land Quality Safety Case, INUTEC(17)P012 Issue 1 Draft C, August 2018
7. 'Regulatory Expectations for Successful Land Quality Management at Nuclear Licensed Sites' joint ONR, EA, NRW and SEPA guidance issued by the ONR in June 2014  
<http://www.onr.org.uk/documents/2014/land-quality-management.pdf>
8. Land Quality Management, ONR Nuclear Safety Technical Assessment Guide, NS-TAST-GD-083, Revision 0, December 2015.  
[http://www.onr.org.uk/operational/tech\\_asst\\_guides/ns-tast-gd-083.pdf](http://www.onr.org.uk/operational/tech_asst_guides/ns-tast-gd-083.pdf)

9. Tradebe Inutec Land Quality Management Strategy and Plan, Inutec procedure INUTEC/P/233, Issue 1, September 2017
10. Drainage Strategy Tradebe B4 Winfrith Wool, September 2017
11. Permit Compliance Matrix to Support EPR Partial Permits Transfer from EPR/PB3898DC to EPR/PP3890SE

<b>Inutec Technical Note</b>	<b>T&amp;S Note (18)03</b>
<b>PERMIT COMPLIANCE MATRIX TO SUPPORT EPR PARTIAL PERMITS TRANSFER FROM EPR/PB3898DC TO EPR/PP3890SE</b>	PAGE 1 OF 19 ISSUE 1 AUGUST 2018

## PURPOSE OF DOCUMENT

This compliance matrix document has been prepared to support the joint application by Inutec Ltd and Magnox Ltd for the partial EPR permit transfer from the Magnox Ltd Winfrith permit (EPR/PB3898DC/V002) to the Inutec Ltd Winfrith permit (EPR/PP3890SE/V005). The partial permit transfer is required at the point at which Inutec Ltd takes ownership of the land (B4 and A50 areas) currently owned by the Nuclear Decommissioning Authority (NDA) and simultaneously is granted its own Nuclear Site Licence. This compliance matrix is provided in addition to the main supporting document (INUTEC/P/287 'Operational Arrangements Document and Compliance with Environmental Permitting Regulations').

## COMPLIANCE ASSESSMENT APPROACH

The compliance assessment has been based on the compliance matrix in Annex A of the existing Inutec Ltd procedure P/287. This procedure demonstrates how Inutec Ltd complies with requirements set out in the Inutec Ltd permits which are:


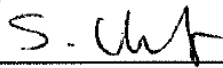

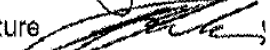
- EPR/PP3890SE – Permit for Inutec Ltd activities on the Winfrith site
- EPR/VB3994DC – Permit for the discharge of Inutec Ltd active liquid effluent at the Tradebe Fawley site
- EPR/GB3190VE – Water Quality Permit covering the discharge of the non-radioactive components of Inutec's active liquid effluent discharges at the Tradebe Fawley Site

In this document a systematic comparison has been made line by line between the Winfrith Inutec Ltd RSR permit EPR/PP3890SE and the Winfrith Magnox Ltd RSR permit EPR/PB3898DC. Differences between the permits have been identified and the impact on the partial permit transfer has been recorded. The document identifies the relevant Inutec documents which demonstrate compliance with the requirements of the permit.

## SUMMARY

Not unexpectedly, given the standardised format of the EPR permits, most of the wording in the permits is the same. The main difference is that the Inutec permit takes account of receipt of third party (customer) waste and also the Inutec permit includes the holding of open radioactive sources which is not included in the Magnox Winfrith permit.

Overall there is very little change required in the permits as a result of the Inutec Ltd nuclear licensing and change of land ownership with the exception of the change in areas covered by the permits as given in Schedules 7.

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<b>PERMIT COMPLIANCE MATRIX TO SUPPORT EPR PARTIAL PERMITS TRANSFER FROM EPR/PB3898DC TO EPR/PP3890SE</b>	T&S Note (18)03	
	Draft A	Page 2 of 19

## ANNEX A - EPR Permits Compliance Matrix

### Matrix Key

Abbreviation	Detail
OAD	Operational Arrangements Document P/287
CEAR	Compilation of Environment Agency Requirements
EOR	Environmental Operating Rule
P/002	Management & Calibration of Measuring & Test Equipment
P/007	Experimental Data and Recording
P/020	Quality Management Audits
P/200	Inutec Ltd Safety and Environment Management System
P/202	Nuclear Baseline and Management of Organisational Change (for Compliance with LC36)
P/250	Management of Unusual Occurrences (UNORs)
P/251	Safety and Environmental Monitoring
P/252	Safety, Health and Environmental Records
P/261	Safety Case Document and Clearance Procedures for Categorised Plant and Modifications on the Winfrith Licensed Site
P/265	Plant Examination, Maintenance, Inspection and Testing
P/282	Accounting for Radioactive Material, Nuclear Matter & Nuclear Material on the Winfrith Site
P/283	Radioactive Waste Production and Accumulation on the Winfrith Licensed Site
P/284	Radioactive Waste Disposal from Winfrith
P/286	Receipt of Radioactive Material in Winfrith Site
P/287	Operational Arrangements Document and Compliance with Environmental Permitting Regulations
P/288	Control and Registration of Radioactive Material
P/305	Guide to Completing a BAT Assessment
P/306	Integrated Waste Strategy
P/307	BAT for General Wastes
P/308	Atmospheric Discharges Specification
P/309	Aqueous Liquid Transfers Specification
P/310	Waste Transfers to other Premises Specification
AI/906	Management and Reporting of Radioactive Waste Arisings – Inutec Ltd Areas
WI/227	RAM Accountancy in the B4 Complex
WI/286	Disposal of General Solid Wastes from the B4 Complex
WI/613	Treatment of Effluent from IBC in the LLWCP B45
WI/915	Transport, Movement and Packaging of Radioactive Material
WI/922	Processing of Customer Waste

<b>PERMIT COMPLIANCE MATRIX TO SUPPORT EPR PARTIAL PERMITS TRANSFER FROM EPR/PB3898DC TO EPR/PP3890SE</b>	T&S Note (18)03	
	Draft A	Page 3 of 19

No.	Inutec EPR Permit Condition Reference	Inutec Ltd Document Compliance Reference	Impact from Partial Permit Transfer from Magnox Permit EPR/PB3898DC
<b>1.1 GENERAL MANAGEMENT</b>			
1.1.1	The operator shall manage and operate the activities: a) In accordance with a written management system that is sufficient to achieve compliance with the conditions of this permit; and b) Using sufficient competent persons and resources.	P/200; P/284; P/287.	Same wording on Magnox permit - No impact
1.1.2	The operator shall maintain records demonstrating compliance with condition 1.1.1	P/252; P/284; A/906	Same wording on Magnox permit - No impact
1.1.3	Any person having duties that are or may be affected by the matters set out in this permit shall have convenient access to a copy of it kept at or near the place where those duties are carried out.		Same wording on Magnox permit - No impact
1.1.4	The operator shall manage and operate the activities in consultation with such suitable RWAs, or other such qualified experts approved by the Environment Agency in writing, as are necessary for the purpose of advising the operator as to compliance with this permit.	RWA's Appointed; P/287.	Same wording on Magnox permit - No impact
<b>2.1 PERMITTED ACTIVITIES</b>			
2.1.1	The operator is only authorised to carry out the activities specified in schedule 1 table S1.1 (the activities).	P/284.	Same wording on Magnox permit - No impact
2.1.2	(EPR/VB3994DC Fawley permit only) Only radioactive material in the form of open sources comprising the radionuclides specified in Schedule 1, Table S1.2 together with any associated decay products present in amounts not exceeding those which could present through radioactive decay of the specified radionuclides shall be kept or used on the premises	No radionuclides or maximum activity specified In Schedule 1, Table S1.2	Same wording on Magnox permit - No impact
2.1.3	(EPR/VB3994DC Fawley permit only) The activity of each radionuclide kept or used on the premises shall not exceed the relevant maximum activity specified in Schedule 1 Table S1.2	No radionuclides or maximum activity specified In Schedule 1, Table S1.2	Same wording on Magnox permit - No impact

<b>PERMIT COMPLIANCE MATRIX TO SUPPORT EPR PARTIAL PERMITS TRANSFER FROM EPR/PB3898DC TO EPR/PP3890SE</b>	T&S Note (18)03	
	Draft A	Page 4 of 19

No.	Inutec EPR Permit Condition Reference	Inutec Ltd Document Compliance Reference	Impact from Partial Permit Transfer from Magnox Permit EPR/PB3898DC
<b>2.2 THE SITE</b>			
2.2.1	The activities shall not extend beyond the site, being the land shown edged in green on the site plans at schedule 7 to EPR/PP3890SE and EPR/GB3190VE and Schedule 5 of EPR/VB3994DC.	<p>EPR Permit EPR/PP3890SE;</p> <p>EPR Permit EPR/GB3190VE</p> <p>EPR Permit EPR/VB3994DC;</p>	Same wording on Magnox permit. Site plans on Schedule 7 of Inutec Winfrith permit (EPR/PP3890SE) and Winfrith Magnox permit (EPR/PB3898DC) to be changed to reflect change of ownership on licensing. Include A50 area.
<b>2.3 OPERATING TECHNIQUES</b>			
2.3.1	<p>The operator shall use the best available techniques</p> <p>a) to minimise the activity of radioactive material kept or used on the premises</p> <p>b) to minimise the activity of radioactive waste produced kept or used on the premises that will require to be disposed of on or from the premises.</p> <p>c) To prevent</p> <p>i) the loss of any radioactive material or radioactive waste</p> <p>ii) access to any radioactive material or radioactive waste by any person not authorised by the operator</p> <p>a) (EPR/VB3994DC only) minimised the period over which radioactive waste is accumulated</p>	<p>P/283; P/283 Annex A; AI/906; TSR/83; WI/922</p>	Some additional wording in 2.3.1 on the Inutec Ltd Winfrith Permit. No impact on the permit partial transfer.



<b>PERMIT COMPLIANCE MATRIX TO SUPPORT EPR PARTIAL PERMITS TRANSFER FROM EPR/PB3898DC TO EPR/PP3890SE</b>	T&S Note (18)03	
	Draft A	Page 5 of 19

No.	Inutec EPR Permit Condition Reference	Inutec Ltd Document Compliance Reference	Impact from Partial Permit Transfer from Magnox Permit EPR/PB3898DC
2.3.2	<p>The operator shall use the best available techniques in respect of the disposal of radioactive waste pursuant to this permit to:</p> <ul style="list-style-type: none"> <li>a) minimise the activity of gaseous and aqueous radioactive waste disposed of by discharge to the environment</li> <li>b) minimise the volume of radioactive material kept or used on the premises</li> <li>c) to dispose of radioactive waste at times, in a form, and in a manner so as to minimise the radiological effects on the environment and members of the public</li> </ul>	P/283; P/283 Annex A; AI/906; WI/922	Same wording on Magnox permit - No impact
2.3.3	<p>The operator shall use the best available techniques to:</p> <ul style="list-style-type: none"> <li>a) exclude all entrained solids, gases and non-aqueous liquids from radioactive aqueous waste prior to discharge to the environment</li> <li>b) Characterise sort and segregate solid and non-aqueous liquid radioactive wastes, to facilities their disposal by optimised disposal routes</li> <li>b) (EPR/VB3994DC only) ensure that any discharge or radioactive gas to the atmosphere is made in a manner which prevents its entry into any building</li> <li>c) (EPR/VB3994DC only) ensure that any residual ash is disposed of as very low level waste in accordance with this permit</li> </ul>	Environmental Operating Rule;	Same wording on Magnox permit - No impact

<b>PERMIT COMPLIANCE MATRIX TO SUPPORT EPR PARTIAL PERMITS TRANSFER FROM EPR/PB3898DC TO EPR/PP3890SE</b>	T&S Note (18)03	
	Draft A	Page 6 of 19

No.	Inutec EPR Permit Condition Reference	Inutec Ltd Document Compliance Reference	Impact from Partial Permit Transfer from Magnox Permit EPR/PB3898DC
2.3.4	<p>The operator shall maintain in good repair the systems and equipment provided:</p> <ul style="list-style-type: none"> <li>a) to meet the requirements of conditions 2.3.1, 2.3.2 and 2.3.3;</li> <li>b) to carry out any monitoring and measurements necessary to determine compliance with the conditions of the permit;</li> <li>c) to measure and assess the exposure of members of the public and radioactive contamination of the environment.</li> </ul>	EMIT Requirements of categorised facilities; P/265; P/287 and Inutec Ltd maintenance system.	Same wording on Magnox permit - No impact
2.3.5	The operator shall check, at an appropriate frequency, the effectiveness of systems, equipment and procedures provided to meet the requirements of conditions 2.3.1, 2.3.2 and 2.3.3.	P/287; P/265; AI/906; WI/922.	Same wording on Magnox permit - No impact
2.3.6	<p>With appropriate criteria for the acceptance into service of systems, equipment and procedures for:</p> <ul style="list-style-type: none"> <li>a) Carrying out any monitoring and measurements necessary to determine compliance with the conditions of this permit;</li> <li>b) Measuring and assessing exposure of members of the public and radioactive contamination of the environment.</li> </ul>	<p>P/265; Inutec Ltd maintenance system</p> <p>Inutec Ltd complies with these conditions by contributing to the Winfrith Site Operator's environmental monitoring programme. Data from the programme is used in the overall Winfrith site discharge report.</p>	Same wording on Magnox permit - At the point of Inutec Ltd being granted its own Nuclear Site Licence and taking ownership of the B4 and A50 areas, Inutec Ltd will contract in the monitoring services through a new Service Level agreement. This agreement specifies the environmental monitoring requirements.
2.3.7	Subject to condition 2.3.2, the operator shall carry on the activities in a manner so as to minimise the risk of pollution from any non-radioactive substances used in or produced by those activities or any non-radiological properties of the radioactive waste, except to the extent the risk is addressed in a separate environmental permit	P/287.	Same wording on Magnox permit - No impact

<b>PERMIT COMPLIANCE MATRIX TO SUPPORT EPR PARTIAL PERMITS TRANSFER FROM EPR/PB3898DC TO EPR/PP3890SE</b>	T&S Note (18)03	
	Draft A	Page 7 of 19

No.	Inutec EPR Permit Condition Reference	Inutec Ltd Document Compliance Reference	Impact from Partial Permit Transfer from Magnox Permit EPR/PB3898DC
2.3.8	<p>The operator shall maintain records of open radioactive sources showing:</p> <ul style="list-style-type: none"> <li>a) the radionuclide present. The date on which it was received and the activity on that date;</li> <li>b) so far as is reasonably practicable its location on the premises;</li> <li>c) if it has been removed from the premises, the date of removal, the activity on that date and the name and address of the person to whom it was transferred; and</li> <li>d) the activity present on the premises at the end of each calendar month</li> </ul>	P/288	There is no requirement for open radioactive sources in the Magnox Winfrith permit - No impact
<b>2.4 IMPROVEMENT PROGRAMME</b>			
2.4.1	The operator shall complete the improvements specified in schedule 1 table S1.2 by the date specified in that table unless otherwise agreed in writing by the Environment Agency.	Non specified in EPR/PP3890SE or EPR/VB3994DC	Non specified in either Winfrith Inutec or Winfrith Magnox permit - No impact
2.4.2	Except in the case of an improvement which consists only of a submission to the Environment Agency, the operator shall notify the Environment Agency within 14 days of completion of each improvement.	Noted	Same wording on Magnox permit - No impact
<b>2.5 PRE-OPERATIONAL CONDITIONS</b>			
2.5.1	The activities shall not be brought into operation until the measures specified in schedule 1 table S1.3 have been completed.	<p>Non specified in EPR/PP3890SE</p> <p>Condition POM1 and POM2 addressed for EPR/VB3994DC</p>	Non specified in either Winfrith Inutec or Winfrith Magnox permit - No impact
2.5.2	Written notification of the date of completion of each measure shall be sent to the Environment Agency within 14 days of the completion of each such requirement.	Note	Same wording on Magnox permit - No impact

<b>PERMIT COMPLIANCE MATRIX TO SUPPORT EPR PARTIAL PERMITS TRANSFER FROM EPR/PB3898DC TO EPR/PP3890SE</b>	T&S Note (18)03	
	Draft A	Page 8 of 19

No.	Inutec EPR Permit Condition Reference	Inutec Ltd Document Compliance Reference	Impact from Partial Permit Transfer from Magnox Permit EPR/PB3898DC
<b>2.6 RECEIPT OF RADIOACTIVE WASTE</b>			
2.6.1	<p>The operator shall:</p> <ul style="list-style-type: none"> <li>a) For each type of radioactive waste that the operator is prepared to receive to produce a written specification of the information required to: <ul style="list-style-type: none"> <li>i. enable the disposal of that type of waste in compliance with this permit; or</li> <li>ii. Where disposal of that type of radioactive waste is not currently permitted, sufficiently characterise that waste to, so far as is reasonably practicable, enable its future disposal;</li> </ul> </li> <li>b) Provide that written specification to any person from whom the operator is prepared to receive radioactive waste of that type;</li> <li>c) Only accept a consignment of radioactive waste that is accompanied by a legible note providing the information specified in 2.6.1(a);</li> <li>d) Keep a copy of any such note received.</li> <li>e) Provide a receipt to the consignor in respect of each consignment of radioactive waste that the operator accepts.</li> </ul>	P/282; AI/906.	Same wording on Magnox permit - No impact
2.6.2	The operator shall ensure that any waste which does not comply with the specification produced pursuant to condition to 2.6.1 is returned to the consignor as soon as reasonably practicable, unless otherwise agreed in writing with the Environment Agency.	Noted.	Same wording on Magnox permit - No impact

<b>PERMIT COMPLIANCE MATRIX TO SUPPORT EPR PARTIAL PERMITS TRANSFER FROM EPR/PB3898DC TO EPR/PP3890SE</b>	T&S Note (18)03	
	Draft A	Page 9 of 19

No.	Inutec EPR Permit Condition Reference	Inutec Ltd Document Compliance Reference	Impact from Partial Permit Transfer from Magnox Permit EPR/PB3898DC
2.6.3	Before the operator first receives radioactive waste from a consignor for the purpose of final disposal of that waste from or on the premises, the operator shall, at the earliest opportunity, inform the local authority, in whose area of responsibility the premises is situated, of the origin and nature of the radioactive waste. (2.6.2. for EPR/VB3994DC)	P/286; AI/906.	Not present in the Magnox permit - No impact
2.6.4	The provisions of 2.6.3 do not apply a) Where the waste consignor is exempt from the requirement to hold an environmental permit for the disposal of radioactive waste; b) To the extent that it would require the disclosure of information relating to sealed radioactive sources.	Noted.	Not present in the Magnox permit - No impact
2.6.5	The provisions of conditions 2.6.1 to 2.6.4 do not apply to any radioactive waste collected as a result of the operator's participation in the National Arrangements for Incidents involving Radioactivity or in the Radsafe scheme.	Noted; P/286.	Same wording on Magnox permit - No impact
<b>2.7 ACCUMULATION OF RADIOACTIVE WASTE (Applies only to EPR/VB3994DC)</b>			
2.7.1	There shall be no accumulation of radioactive waste except the types of radioactive waste specified in Schedule 2	INUTEC/AI/029 'Management of the Transfer and Discharges of Inutec Ltd Liquid Effluent to Tradebe Fawley'	
2.7.2	The limits on accumulation given in Schedule 2 shall not be exceeded	INUTEC/AI/029	

<b>PERMIT COMPLIANCE MATRIX TO SUPPORT EPR PARTIAL PERMITS TRANSFER FROM EPR/PB3898DC TO EPR/PP3890SE</b>	T&S Note (18)03	
	Draft A	Page 10 of 19

No.	Inutec EPR Permit Condition Reference	Inutec Ltd Document Compliance Reference	Impact from Partial Permit Transfer from Magnox Permit EPR/PB3898DC
2.7.3	The operator shall maintain records of radioactive waste showing: <ul style="list-style-type: none"> <li>a) The radionuclide present on the date on which accumulation began and the activity on that date;</li> <li>b) So far as is reasonably practicable its location on the premises;</li> <li>c) If it has been removed from the premises, the date of removal, the activity on that date and the name and address to whom it was transferred; and</li> <li>d) The total activity and volume of radioactive waste present on the premises.</li> </ul>	INUTEC/AI/029	Only applies to Inutec Fawley RSR permit.  No Impact
<b>3.1 DISPOSALS OF RADIOACTIVE WASTE</b>			
3.1.1	Subject to condition 3.1.4, there shall be no disposals of radioactive waste except of the types of radioactive waste and by the disposal routes specified in schedule 3.	P/284.	Same wording on Magnox permit - No impact
3.1.2	The limits on disposals given in schedule 3 shall not be exceeded.	P/284; P/287; P306: P307	Same wording on Magnox permit - No impact
3.1.3	The Operator shall ensure the use of an optimised disposal route when disposing of any radioactive waste in accordance with Table S3.4.	P/284; P/286; P305: P306; P307. INUTEC/AI/029	Same wording on Magnox permit - No impact

<b>PERMIT COMPLIANCE MATRIX TO SUPPORT EPR PARTIAL PERMITS TRANSFER FROM EPR/PB3898DC TO EPR/PP3890SE</b>	T&S Note (18)03	
	Draft A	Page 11 of 19

No.	Inutec EPR Permit Condition Reference	Inutec Ltd Document Compliance Reference	Impact from Partial Permit Transfer from Magnox Permit EPR/PB3898DC
3.1.4  (3.1.5 for VB399 4DC)	<p>The operator may dispose of radioactive waste, not being radioactive waste otherwise authorised to be disposed of, which is collected as a result of the operator's participation in the National Arrangements for Incidents involving Radioactivity or in the Radsafe scheme provided that the operator:</p> <ul style="list-style-type: none"> <li>a) Transfers the radioactive waste to a person whom the Environment Agency has agreed in writing may receive that radioactive waste;</li> <li>b) As soon a reasonably practicable provides available details in writing to the Environment Agency of the nature of the radioactive waste, the radionuclides present, their activities and the manner and date of disposal</li> </ul>	P/284; P/286.	Same wording on Magnox permit - No impact
3.1.5	<p>The operator shall ensure that the transfer of radioactive waste is in accordance with the directions of the person to whom the radioactive waste is transferred that are necessary to enable that person to comply with all relevant regulatory requirements.</p>	P/284; AI/906.	Same wording on Magnox permit - No impact

<b>PERMIT COMPLIANCE MATRIX TO SUPPORT EPR PARTIAL PERMITS TRANSFER FROM EPR/PB3898DC TO EPR/PP3890SE</b>	T&S Note (18)03	
	Draft A	Page 12 of 19

No.	Inutec EPR Permit Condition Reference	Inutec Ltd Document Compliance Reference	Impact from Partial Permit Transfer from Magnox Permit EPR/PB3898DC
3.1.6	<p>The operator shall:</p> <ul style="list-style-type: none"> <li>a) Ensure that the person to whom radioactive waste is transferred receives at the time of transfer of each consignment a clear and legible note signed on the operator's behalf. <ul style="list-style-type: none"> <li>i. Stating the total activity in the consignment of each relevant radionuclide or group of radionuclides listed in the relevant table in schedule 3; or</li> <li>ii. Stating when no relevant radionuclide or group of radionuclides is specified in schedule 3, the total activity in the consignment of each radionuclide or group of radionuclides as listed in the written specification of the person to whom the radioactive waste is transferred.</li> </ul> </li> <li>b) Obtain a note signed on behalf of the person to whom radioactive waste is transferred, at the time of transfer, stating that the transfer has taken place;</li> <li>c) Keep a copy of any note issued under condition 3.1.6(a) and any note received under condition 3.1.6(b)</li> </ul>	P/284; WI/915.	Same wording on Magnox permit - No impact
3.1.7	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.	P/284; AI/906	Same wording on Magnox permit - No impact



<b>PERMIT COMPLIANCE MATRIX TO SUPPORT EPR PARTIAL PERMITS TRANSFER FROM EPR/PB3898DC TO EPR/PP3890SE</b>	T&S Note (18)03	
	Draft A	Page 13 of 19

No.	Inutec EPR Permit Condition Reference	Inutec Ltd Document Compliance Reference	Impact from Partial Permit Transfer from Magnox Permit EPR/PB3898DC
<b>3.2 MONITORING</b>			
3.2.1	<p>The operator shall:</p> <ul style="list-style-type: none"> <li>a) Take samples and conduct measurements, tests, surveys, analyses and calculations to determine compliance with the conditions of this permit;</li> <li>b) Use the best available techniques when taking samples and conducting such measurements, tests, surveys, analyses and calculations, unless particular techniques are specified in schedule 3 of this permit;</li> <li>c) Define and document the techniques being employed to determine the activity of the radioactive waste disposals and shall inform the Environment Agency in writing in advance of any modifications to those techniques that have a potential to change the results obtained.</li> </ul>	P/200; P/287; OAD; AI/906 and WI for discharges.	Same wording on Magnox permit - No impact
3.2.2	The operator shall maintain records of all monitoring required by this permit including records of the taking and analysis of samples, instrument measurements (periodic and continual), calibrations, examinations, tests and surveys and any assessment or evaluation made on the basis of such data.	P/002; P/252; P/284; AI/906 and Inutec Ltd maintenance system.	Same wording on Magnox permit - No impact. Broader site and off-site environmental monitoring contracted in via service agreement with Magnox.

<b>PERMIT COMPLIANCE MATRIX TO SUPPORT EPR PARTIAL PERMITS TRANSFER FROM EPR/PB3898DC TO EPR/PP3890SE</b>	T&S Note (18)03	
	Draft A	Page 14 of 19

No.	Inutec EPR Permit Condition Reference	Inutec Ltd Document Compliance Reference	Impact from Partial Permit Transfer from Magnox Permit EPR/PB3898DC
3.2.3	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 MCERTS certification or MCERTS accreditation (as appropriate), where available, unless agreed in writing by the Environment Agency.	Aqueous waste is transferred to the Active Liquid Effluent System (ALES) operated by Magnox on the Winfrith site. Magnox operates an MCERTS certification system for the discharges to sea from ALES and the sea-tanks.	Under V005 of Winfrith Inutec permit EPR/PP3890SE transfers now made to Fawley. WI/028, 029, 030  No impact on partial transfer, changes in place prior to this
3.2.4	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.	Noted.	Same wording on Magnox permit - No impact
3.2.5	If required by the Environment Agency, the operator shall: <ul style="list-style-type: none"> <li>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;</li> <li>b) Keep samples, provide samples or dispatch samples for tests at a laboratory, as the Environment Agency specifies and ensure that the samples or residues thereof are collected from the laboratory within three months of receiving written notification that testing and repackaging in accordance with the relevant legislation are complete.</li> </ul>	Noted.	Same wording on Magnox permit - No impact

<b>PERMIT COMPLIANCE MATRIX TO SUPPORT EPR PARTIAL PERMITS TRANSFER FROM EPR/PB3898DC TO EPR/PP3890SE</b>	T&S Note (18)03	
	Draft A	Page 15 of 19

No.	Inutec EPR Permit Condition Reference	Inutec Ltd Document Compliance Reference	Impact from Partial Permit Transfer from Magnox Permit EPR/PB3898DC
3.2.6  (3.1.3 for VB39 94D C)	<p>The operators shall carry out:</p> <p>a) Regular calibration, at an appropriate frequency, of systems and equipment provided for:</p> <p>(i) Carrying out any monitoring and measurements necessary to determine compliance with conditions of the permit;</p> <p>(ii) Measuring and assessing exposure of members of the public and radioactive contamination of the environment.</p> <p>b) Regular checking, at an appropriate frequency, that such systems and equipment are serviceable and correctly used.</p>	P/002; P/287 and Inutec Ltd maintenance system.	Same wording on Magnox permit - No impact
<b>4.1 RECORDS</b>			
4.1.1	<p>All records required to be made by this permit shall:</p> <p>a) Be legible;</p> <p>b) Be made as soon as reasonably practicable;</p> <p>c) If amended, be amended in such a way that the original and any subsequent amendments remain legible, or are capable of retrieval; and</p> <p>d) Be retained until notified in writing by the Environment Agency that records no longer need to be retained.</p>	P/007; P/252.	Same wording on Magnox permit - No impact
4.1.2	The operator shall keep on the premises all records, plans and the management system required by this permit, unless otherwise agreed in writing by the Environment Agency.	P/007; P/252.	Same wording on Magnox permit - No impact

<b>PERMIT COMPLIANCE MATRIX TO SUPPORT EPR PARTIAL PERMITS TRANSFER FROM EPR/PB3898DC TO EPR/PP3890SE</b>	T&S Note (18)03	
	Draft A	Page 16 of 19

No.	Inutec EPR Permit Condition Reference	Inutec Ltd Document Compliance Reference	Impact from Partial Permit Transfer from Magnox Permit EPR/PB3898DC
4.1.3	<p>The operator shall</p> <ul style="list-style-type: none"> <li>a) Retain records made in accordance with any previous relevant permit issued to the operator and related to the premises covered by this permit;</li> <li>b) Retain records transferred to the operator, which were made in accordance with any previous relevant permit related to the premises covered by this permit.</li> </ul>	P/252	Same wording on Magnox permit - No impact
4.2.1	The operator shall send all reports and notifications required by this permit to the Environment Agency using the contact details supplied in writing by the Environment Agency.	P/287; AI/906.	Same wording on Magnox permit - No impact
4.2.2	<p>The operator shall supply such information in relation to:</p> <ul style="list-style-type: none"> <li>a) The disposals of radioactive waste; and</li> <li>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.</li> </ul> <p>In such format and within such timescales as the Environment Agency may specify in writing.</p>	P/287; AI/906.	Same wording on Magnox permit - No impact

<b>PERMIT COMPLIANCE MATRIX TO SUPPORT EPR PARTIAL PERMITS TRANSFER FROM EPR/PB3898DC TO EPR/PP3890SE</b>	T&S Note (18)03	
	Draft A	Page 17 of 19

No.	Inutec EPR Permit Condition Reference	Inutec Ltd Document Compliance Reference	Impact from Partial Permit Transfer from Magnox Permit EPR/PB3898DC
<b>4.3 NOTIFICATIONS</b>			
4.3.1	<p>The Environment Agency shall be notified without delay following the detection of:</p> <ul style="list-style-type: none"> <li>a) Any malfunction, breakdown or failure of equipment or techniques and any accident, which has caused, is causing or may cause significant pollution or may generate significant amounts of radioactive waste;</li> <li>b) The breach of a limit specified in this permit, or disposal of waste other than by a relevant permitted route;</li> <li>c) Any significant adverse environmental effects.</li> </ul>	P/203; P/250;	Same wording on Magnox permit - No impact
4.3.2	Any information provided under condition 4.3.1 shall be confirmed by sending the information listed in schedule 5 within the time period specified in that schedule.	P/203; P/250;	Same wording on Magnox permit - No impact
4.3.3	Where the Environment Agency has requested in writing that it shall be notified when the operator is to undertake monitoring and or spot sampling, the operator shall inform the Environment Agency when the relevant monitoring and/or spot sampling is to take place. The operator shall provide this information to the Environment Agency at least 14 days before the date the monitoring is to be undertaken.	Noted.	Same wording on Magnox permit - No impact
4.3.4	<p>The Environment Agency shall be notified within 14 days of the occurrence of the following matters, except where such disclosure is prohibited by Stock Exchange rules:</p> <ul style="list-style-type: none"> <li>a) Any change in the operator's trading name, registered name or registered office address;</li> <li>b) Any steps taken with a view to the operator going into administration, entering into a company voluntary arrangement or being wound up.</li> </ul>	P/202.	Same wording on Magnox permit - No impact

<b>PERMIT COMPLIANCE MATRIX TO SUPPORT EPR PARTIAL PERMITS TRANSFER FROM EPR/PB3898DC TO EPR/PP3890SE</b>	T&S Note (18)03	
	Draft A	Page 18 of 19

No.	Inutec EPR Permit Condition Reference	Inutec Ltd Document Compliance Reference	Impact from Partial Permit Transfer from Magnox Permit EPR/PB3898DC
4.3.5	<p>Where the operator proposes to make a change in the management system or resources, which might have, or might reasonably be seen to have a significant impact on how compliance with the conditions of this permit is achieved:</p> <ul style="list-style-type: none"> <li>a) The operator shall notify the Environment Agency at least 28 days before making that change, or where that is not possible, without delay; and</li> <li>b) Shall include in the notification a description of the proposed changes.</li> </ul>	<p>P/202; P/261 (for modification to the facility safety case). The Site Operator also has Tenant Safety Requirements linked to the Nuclear Site Licence conditions (LC36).</p>	<p>Same wording on Magnox permit - No impact</p>
4.3.6	<p>If, in any week, the activity in any radioactive waste disposed of from any outlet or group of outlets specified in schedule 3 of any radionuclide or group of radionuclides exceeds, or is likely to exceed, the relevant Weekly Advisory Level (where specified), the operator shall:</p> <ul style="list-style-type: none"> <li>a) Without delay, inform the Environment Agency and the Food Standards Agency;</li> <li>b) As soon as reasonably practicable, advise the Environment Agency and the Food Standards Agency of the circumstances at the premises leading to the release and the possible impact of any deposition of radioactivity on pasture or crops in the vicinity of the premises, including any measurements made.</li> </ul>	<p>Noted. Currently no Weekly Advisory Level imposed.</p>	<p>Same wording on Magnox permit - No impact</p>

<b>PERMIT COMPLIANCE MATRIX TO SUPPORT EPR PARTIAL PERMITS TRANSFER FROM EPR/PB3898DC TO EPR/PP3890SE</b>	T&S Note (18)03	
	Draft A	Page 19 of 19

No.	Inutec EPR Permit Condition Reference	Inutec Ltd Document Compliance Reference	Impact from Partial Permit Transfer from Magnox Permit EPR/PB3898DC
4.3.7	<p>If, in any quarter, the activity in any waste discharges from any outlet or group of outlets specified in schedule 3 of any radionuclide or group of radionuclides exceeds the relevant Quarterly Notification Level (where specified), the operator shall provide the Environment Agency with a written submission which includes:</p> <ul style="list-style-type: none"> <li>a) Details of the occurrence;</li> <li>b) A description of the means used to minimise the activity of the radioactive waste discharged;</li> <li>c) A review of those means having regard to conditions 2.3.1, 2.3.2 and 2.3.3;</li> </ul> <p>Not later than 14 days from making the record which demonstrates such excess.</p>	Noted. P/284.	Same wording on Magnox permit - No impact
4.3.8	<p>If, any operator believes or has reasonable grounds for believing that an open source has been lost or stolen the operator shall:</p> <ul style="list-style-type: none"> <li>a) without delay inform the Environment Agency;</li> <li>b) make all reasonable efforts to recover that source;</li> <li>c) as soon as reasonably practicable report the circumstances in writing to the Environment Agency.</li> </ul>	Noted. P/282; P252; WI915; WI/227.	Not included in the Magnox Winfrith permit as no requirement for open source holding - No impact

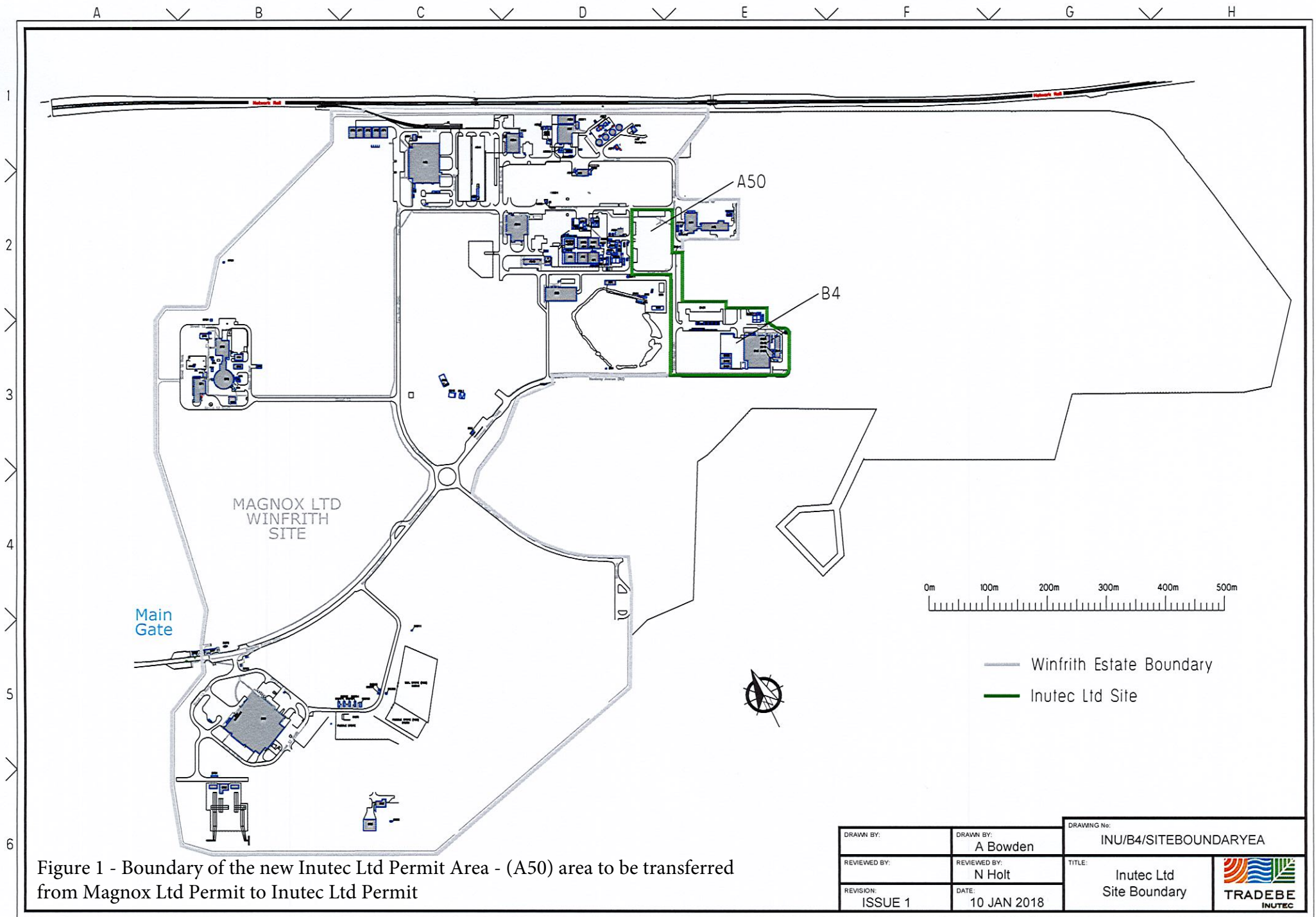


Figure 1 - Boundary of the new Inutec Ltd Permit Area - (A50) area to be transferred from Magnox Ltd Permit to Inutec Ltd Permit



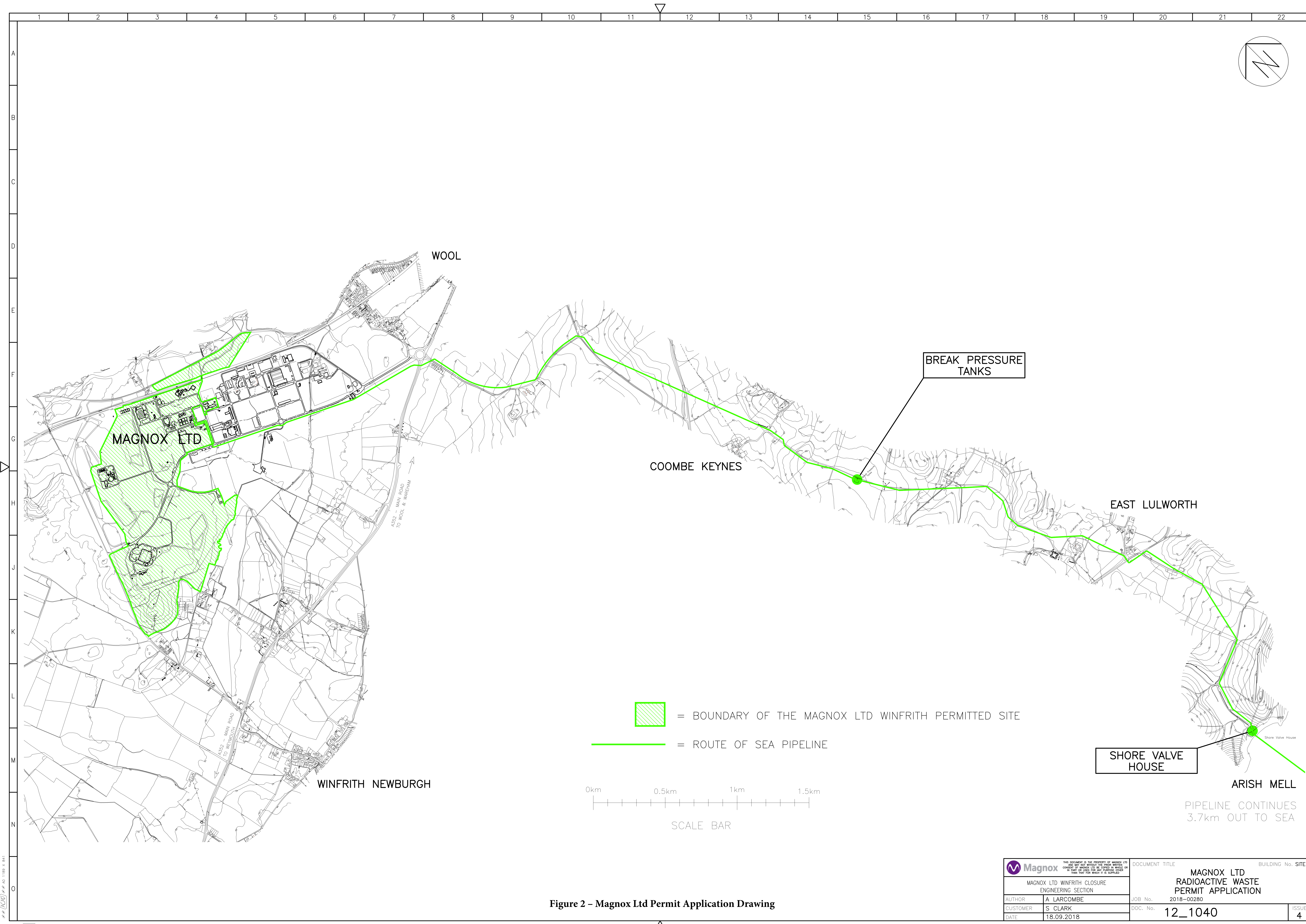
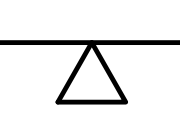


Figure 2 – Magnox Ltd Permit Application Drawing

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MAGNOX LTD WINFRITH CLOSURE ENGINEERING SECTION		MAGNOX LTD RADIOACTIVE WASTE PERMIT APPLICATION			
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