

**Regulatory position statement**

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**Security requirements for radioactive sealed sources**

**RS-POL-010**

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## Aim of this statement

This statement explains how SEPA (we) intend to regulate and enforce the updated “Security Requirements for Radioactive Sources", as implemented by standard condition D.2.1, and what you will need to do to comply with them during a transitional period, which begins 16 January 2025 and ends 30 June 2029.

This statement, and the updated security requirements, apply to you if you manage:

* Radioactive sources within [IAEA categories](https://www.iaea.org/publications/7237/categorization-of-radioactive-sources)[[1]](#footnote-2) 1-4, including High Activity Sealed Sources (HASS).
* Collections of category 5 sealed radioactive sources where their aggregated activity exceeds category 5.

The aim of the security requirements is to ensure consistent high standards of security for sealed sources in the UK. In all cases, our approach to regulation of source security will be reasonable and proportionate. In Scotland the regime is administered by the regulator, SEPA, with specialist security advice provided by Police Scotland Counter Terrorism Security Advisors (CTSA). It will be the CTSA that issue you with a copy of the Security Requirements for Radioactive Sources 2024.

## Background

The UK environment agencies regulate the secure management of radioactive sealed sources, in close co-operation with local police Counter Terrorism Security Advisers (CTSAs), and in accordance with the “Security Requirements for Radioactive Sources” issued by the UK’s National Counter Terrorism Security Office (NaCTSO).

Since NaCTSO issued the last version of the “Security Requirements for Radioactive Sources” in 2011, the threat from both domestic and international terrorism has continued to evolve.

Incidents and events, both at home and abroad, and advances in technologies available to those who may wish to misuse radioactive sources to do harm, mean that security measures must be robust and periodically reviewed to ensure they are appropriate.

NaCTSO, in cooperation with the UK environment agencies, has now updated the “Security Requirements for Radioactive Sources” (the ‘updated security requirements’), which incorporate two significant developments:

* The [IAEA’s Nuclear Security Series](https://www.iaea.org/resources/nuclear-security-series)[[2]](#footnote-3) has been updated with the publication of the updated implementing guidance, ‘[Security of Radioactive Material in Use and Storage and of Associated Facilities](https://www.iaea.org/publications/12360/security-of-radioactive-material-in-use-and-storage-and-of-associated-facilities)’[[3]](#footnote-4) (NSS 11-G (Rev.1)). This recommends some additional security management measures.
* The UK standards for physical security measures (LPS1175), produced by the [Building Research Establishment](https://bregroup.com/)[[4]](#footnote-5), have been updated to offer greater resistance to higher powered tools that are now readily available.

The updated security requirements apply across the UK, and we are working with the other environment agencies to implement them as consistently as legislation and policies allow.

These security requirements provide a balance between managing sealed sources securely while still enabling them to be used safely by authorised personnel.

You must establish a dynamic and effective security culture at all levels of operational staff and management. Security culture is created from beliefs, attitudes, behaviour and management systems, and you must enable and foster these to ensure effective security.

The security requirements mean that you must apply security measures on a graded basis, taking into account the relative attractiveness of the sealed source, and the potential consequences resulting from malicious use. Effective security is achieved through a combination of deterrence, detection, delay, response and security management.

The level of security you need to apply to your sealed sources depends upon their category and is specified in the updated security requirements document. If you require clarification in relation to the correct categorisation of a sealed source, then you should seek the advice and guidance of the environmental regulator SEPA. We have published “Guidance on calculating source category for sealed radioactive sources” (document reference RS-G-030) which can be found on the [SEPA website](https://www.sepa.org.uk/media/383812/rs_g_030_guidance_on_calculating_category_of_sealed_sources.pdf)[[5]](#footnote-6).The CTSA will give advice and guidance as to what security measures will be needed to meet with the updated Security Requirements for Radioactive Sources.

You should consult with the CTSA prior to implementing any changes required to comply with the updated security requirements.

## Obtaining the updated security requirements

In July 2024 Police Scotland CTSAs began distributing the updated security requirements during their regular programme of annual security inspections. During your next scheduled CTSA inspection you will be asked to sign for your copy, and your CTSA will discuss the main changes from the 2011 requirements with you.

If you manage sealed sources within the offshore environment, you should contact the CTSA at scdctsaaberdeen@scotland.police.uk to obtain the “Security Requirements for Radioactive Sources 2024” document, and to open discussions on the implementation of the updated security requirements.

## Implementing this change

SEPA regulates compliance with the “Security Requirements for Radioactive Sources” document by setting EASR standard conditions within our Permits. As our standard condition referred to the 2011 version, we needed to update the standard conditions to reference the newly updated 2024 version.

In early 2024, we carried out a targeted consultation on draft proposals for changes to the standard conditions. We proposed that D.2.3 be deleted, and that D.2.1 be revised as follows:

*D.2.1 You must have and implement security measures in accordance with the document “Security Requirements for Radioactive Sources, dated 2024”.*

We then published our intent to revise the standard conditions on 16 October 2024 by contacting and notifying all authorised persons managing radioactive sealed sources.

The updated security requirements will take effect in Scotland from 16 January 2025.

## Our regulatory position on your compliance with the updated security requirements

### 5.1 Knowing when you need to comply

SEPA and the CTSAs will begin regulating and enforcing the updated security requirements for new and existing authorised persons from 16 January 2025.

If you were a permit holder before this date you should already be complying with the 2011 security requirements as was required by your permit under Condition D.2.1 of the Standard Conditions for radioactive substances activities. Standard condition D.2.1 will be modified on 16 January 2025 to refer to the updated 2024 security requirements. We will be adopting a transitional period over which you will need to achieve compliance with the modified standard condition D.2.1 and updated 2024 security requirements. You are expected to comply with standard condition D.2.1 and the updated 2024 security requirements as soon as reasonably practicable, and before the transitional period ends on **30 June 2029**.

If you already hold a permit for managing such sources and, at some point over the transition period, are intending to undertake substantial refurbishment to an area which forms part of your source security, you must ensure that your refurbishment works comply with the updated source security requirements. You should consult with the CTSA prior to commencing these refurbishments.

If you are granted a permit for the first time after 16 January 2025, you must comply with the updated security requirements straight away, and we will regulate you accordingly.

### 5.2 Assessing your current security measures

Once you have received the updated security requirements, and discussed them with your CTSA, you will need to prepare to take steps to ensure you can comply with them.

You will need to ensure that you fully understand what the updated security requirements mean for your current security measures.

Specifically, you will need to assess your current security measures and identify whether or not they comply with the updated security requirements. You will then need to determine what improvements you need to make to achieve compliance.

Your CTSA will be able to advise you during this process.

You may find that some of the improvements needed to achieve compliance will be relatively straightforward and affordable, and you must make these changes as soon as reasonably practicable.

But we recognise that other improvements may need more planning, investment and effort, and take a longer time to implement. If this is the case for you, we require you to produce an improvement plan, explained below in Section 5.3, detailing how you intend to implement the necessary changes.

### 5.3 Producing your improvement plan

If any improvements required to be made to your security measures are not going to be complete by 01 April 2026, then you must have a written improvement plan in place by 01 January 2026.

Your improvement plan should set out clearly what you need to do to achieve compliance with the updated security requirements. It should include dates for starting and completing essential tasks, such as securing funds, updating management arrangements, upgrading facilities or installing new equipment. However, you should also discuss your proposals for improvement with your CTSA, as you develop your improvement plan, so that they can advise you on whether it will meet the updated security requirements.

### 5.4 Achieving full compliance with the updated requirements

You must comply with the updated security requirements as soon as reasonably practicable, and before the transitional period ends on 30 June 2029.

You will need to put your improvement plan into action as soon as you reasonably can. Both SEPA and the CTSA will expect to see evidence of you making substantial progress on the required improvements at subsequent routine inspections after 01 April 2026.

If you have produced an improvement plan which contains timescales that are reasonable and can be justified, and you can show that you have, or will have, the financial provision to support the investments needed, your CTSA and SEPA Regulatory Officer (RO) and will take this into account, together with the scope, complexity and cost of the improvements required.

If your CTSA and RO are not satisfied that you have made sufficient progress to achieve compliance with the updated security requirements in accordance with your improvement plan, or if we have other regulatory concerns, we may need to consider enforcement action in line with SEPA’s enforcement policy.

### 5.5 Regulating mobile radioactive sources

The updated security requirements apply in full to any mobile radioactive source, whether at its home base, or in a temporary location. You must ensure that you maintain compliance with the updated security requirements wherever a mobile radioactive source is located. SEPA may carry out compliance inspections of mobile radioactive sources away from their home base.

Throughout the transitional period, as laid out within section 5.1 of this regulatory position statement, you must ensure that when your mobile radioactive source is held at a temporary location that the security measures in place are equivalent to those where the mobile radioactive source is normally kept.

If you hold a SEPA permit or registration that allows mobile radioactive sources permitted in England, Wales or Northern Ireland to be used in Scotland, the relevant environment agency (EA, NRW or NIEA) and CTSA will assess compliance against the updated security requirements at the permitted home base in that part of the UK.

### 5.6 Regulating radioactive sources in Scotland’s offshore area

As EASR now also applies to radioactive substances activities carried out in Scotland’s offshore area, you will need to comply with the security requirements in Scotland’s offshore area in the same way as you would if you were managing radioactive sources onshore.

We do recognise that the offshore environment offers some security mitigations not available onshore. CTSA have considered factors such as the remote location of offshore installations, the management and control of personnel on the installation, and the limited means of access and egress by helicopter or ship.

The security requirements include at Annex E a security checklist to take account of compensatory measures in situations where you may not be able to achieve the relevant certified security standards for your sealed sources. CTSA have produced a generic offshore Annex E to reflect these factors, and this may be applied alongside practicable upgrades to your current security measures. This will form part of the discussions you must have with CTSA about the security measures you will need to meet the requirements.

Due to the inaccessibility of offshore installations, SEPA and CTSA will usually assess your compliance with the security requirements using information you provide, such as your Site Security Plans, photographs, security measure certification and any other relevant documentation you provide relating to the security measures you have implemented. You should however take care when transmitting this information as it may be sensitive in nature.

Our experience shows that you will be able to implement suitable arrangements within this framework whilst continuing to carry out your work with sealed sources safely and securely. In cases where the security requirements appear likely to cause operational problems, you should seek further advice from CTSA and SEPA.

However, SEPA, NaCTSO, and CTSA have agreed that the security requirements will not apply to:

* Any sealed sources affixed to a structure located below the surface of the sea.
* Any sealed sources, such as grout density monitors, encased in concrete which is part of the structure of the installation.

We do not regulate the security of radioactive sources during transport, as this is regulated by Office for Nuclear Regulation (ONR).

Some additional SEPA and CTSA offshore specific positions are highlighted below.

### Site security plan

EASR standard condition D.2.2 states that “You must have, implement, maintain, and review a security plan”. Your Site Security Plan for your installation must describe how the security requirements will be met and, if they cannot be complied with, what compensatory measures are in place. You must discuss any compensatory measures with CTSA and seek their agreement that they provide a level of security comparable to the relevant rated measures.

### Changes in location

If your permitted installation or vessel with a sealed source permit moves to a location within the Territorial Sea Limit (the sea extending up to 12 nautical miles from the [Scottish coast baseline](https://marine.gov.scot/information/12-nautical-miles-12m-limit-scottish-territorial-seas-territorial-sea-act-1987-scotland)[[6]](#footnote-7)) you can no longer legitimately claim remoteness as a mitigation. If your permitted installation or vessel has sealed sources onboard, we require you to have adequately considered the security of these sources before the move, and to have taken steps to ensure their continued security. Suitable steps might include, for example, removing the sources to a location which complies fully with the security requirements, or putting in place additional security measures.

If such changes in location are reasonably foreseeable, you should include details of suitable steps to maintain security within the Site Security Plan. You can seek further advice from CTSA.

### Third party / contractor sources

Should you need the services of a third party / contractor, who will be bringing their own sources onto your installation (e.g. industrial radiographers, well loggers etc), under their own permit, it would be considered best practice for you to discuss security arrangements with the contractor in advance to ensure there will be appropriate secure storage while the sources are on your installation. You will know what security measures would be best for your installation to make sure the sources remain secure whilst allowing your operations to continue with the least form of disruption.

Please note however, for the purposes of clarity, it is the responsibility of each authorised person who holds a sealed source permit to ensure that they fully comply with the requirements of their own permit at all times.

## 6. Further information

This regulatory position statement applies only in Scotland. The terms of this regulatory position statement may be subject to review and be changed or withdrawn in light of regulatory or legislative changes, future government guidance or experience of its use.

If you need any further information on this regulatory position statement or any issues around it, please contact us at RSnotifications@sepa.org.uk.

1. IAEA Categorization of Radioactive Sources - <https://www.iaea.org/publications/7237/categorization-of-radioactive-sources> [↑](#footnote-ref-2)
2. IAEA’s Nuclear Security Series - <https://www.iaea.org/resources/nuclear-security-series> [↑](#footnote-ref-3)
3. NSS 11-G - <https://www.iaea.org/publications/12360/security-of-radioactive-material-in-use-and-storage-and-of-associated-facilities> [↑](#footnote-ref-4)
4. BRE Group website – <https://bregroup.com> [↑](#footnote-ref-5)
5. Guidance on calculating source category for sealed radioactive sources - <https://www.sepa.org.uk/media/383812/rs_g_030_guidance_on_calculating_category_of_sealed_sources.pdf> [↑](#footnote-ref-6)
6. Scottish territorial seas - <https://marine.gov.scot/information/12-nautical-miles-12m-limit-scottish-territorial-seas-territorial-sea-act-1987-scotland> [↑](#footnote-ref-7)