

Trawsfynydd Site

Waste Management Compliance Matrix, Sites in England and Wales.

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PREPARED BY:

Thomas G Williams..... DATE 24.07.23

AGREED BY:

EHSS&Q Manager Andrew Innes..... DATE 25 July 2023

APPROVED AND AUTHORISED FOR ISSUE:

Site Director Angharad Rayner..... DATE

Document Nominated Responsible Person:	Angharad L Rayner
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A REVIEW/CHANGE OF THIS DOCUMENT WAS CARRIED OUT AS FOLLOWS:

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DATE	CARRIED OUT BY	SIGNATURE OF DRP (Document Resp Person)	AMENDMENT AND BRIEF REASON	DCF NO.
03/10/11	T Hopkins		Update to reflect new company and regulatory requirements.	
13/03/12	T Hopkins		Update to specifically outline generating documents and update references to MCP-016	
22/04/16	A Carr		Update to reference Magnox Environmental Legal Register and review of tables to incorporate Harwell / Winfrith documents and align with PD-026	
10/05/17	K Yakan		Update of references to align with the progress of the Common Process project.	
01/08/17	K Yakan		For issue 7 - Updated references to company documents and revised Regulations	
14/02/18	K Yakan		For issue 8 - Updated references to company documents	
29/6/18	P Carson		For issue 9 – Updated legislation and references to company documents.	
08/08/12	JR Nobbs		Update to 'Site Implementation Documents' Column only to reflect issue of Traws Interface Document to MCP-016 and withdrawal of Traws/MCP/16	



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24/06/13	JR Nobbs		Update to 'Site Implementation Documents' column only- to reflect issue of MCP-016 issue 2 and its associated TRAWS Interface Document and the issue of further new site Waste Management dept. procedures.
28/08/14	JR Nobbs		Update to 'Site Implementation Documents' column only- to reflect issue of MCP-016 issue 3 and its associated TRAWS Interface Document and to review and update the 'Site Supporting Documents' column
20/02/17	A.Roberts		Reviewed as part of Site's Document recovery Plan, and to reflect title changes from company Document - MCP-016 to Process Document PD-026
01/11/2018	Thomas G Williams		Reviewed to reflect company issued template
05/09/2022	Thomas G Williams		Reviewed to reflect company issued template and current references
24/07/2023	Thomas G Williams		Reviewed to update references from TRAWS-MCP-019 to PD-001

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1 Introduction

The requirement for the production and population of both the company and site Waste Management Compliance Matrices is specified in Process Document PD-026 Management of Waste.

2 Purpose

The purpose of the site waste management compliance matrix is to list the site-specific implementing documents against the detailed requirements (both legislative and company) for the management of waste. The detailed requirements are specified in the company waste management compliance matrix; reference F-318. This provides the controlling template for sites to produce the site compliance matrix.

3 Scope

The requirement to complete this compliance matrix only applies to the following sites:

- Berkeley Site
- Bradwell Site
- Dungeness 'A' Site
- Hinkley Point 'A' Site
- Oldbury Site
- Sizewell 'A' Site
- Trawsfynydd Site
- Wylfa Site/ Maentwrog
- Harwell
- Winfrith

Legislative requirements relating to management of Radioactive and Non-Radioactive Wastes, and Waste Transportation are included where related to permits. All other legislative requirements can be found in the Magnox Environmental Legal Register (see Standard Procedure S-150 for details).

4 Responsibilities

The Head of Profession Environment and Waste (HoPE&W) in conjunction with the Waste Standards and Assurance Manager, is responsible for ensuring that a review of the company controlling compliance matrix is undertaken at least on a 3 yearly basis; or when there are relevant changes in legislation or company requirements. The HoPE&W is also responsible for identifying the appropriate company implementation document or ensuring revision of an existing document, or the drafting of a new document to address the company compliance arrangements.

The Waste Director is responsible for ensuring that there are appropriate company waste implementation documents.

The EHSS&Q Manager at individual sites is responsible for the review and update of the site compliance matrix on a 3 yearly basis, or when there are relevant changes in legislation or company requirements highlighted in a revision to the company compliance matrix. This is to be undertaken in consultation with the Waste Manager. The EHS&Q Manager is to advise the HoPE&W of any additional amendments that are required to be made to the company compliance matrix. The EHSS&Q Manager is also responsible for ensuring that there are appropriate site implementation documents for those activities/ processes (aqueous/gaseous wastes) within EHSS&Q functional responsibilities.

The Head of Waste/Regional Waste Manager for a site is responsible for ensuring that there are appropriate site waste management implementation documents for solid and organic liquid waste.

Site Directors are responsible for ensuring that there are sufficient resources, both in terms of Suitably Qualified and Experienced Persons (SQEP) and infrastructure to effectively comply with the requirements of this matrix.

5 Procedure

The Site Waste Management Compliance Matrix shall identify the site-specific implementation documents against the detailed requirements given in the compliance matrix.

Those sites with a District Survey Laboratory (DSL), or Environmental Permits for non-nuclear licensed sites, are required to complete the site compliance arrangements by providing either common implementation documents both for the site and the DSL/non-nuclear EPR, or clearly identifying site-specific and DSL/non-nuclear EPR-specific documents within the site implementation documents column. Where more than one permit is held by the site against which there are different requirements, the table in the template could be duplicated and each permit referenced to make this clear.

Where a requirement is not applicable, sites are required to state 'not currently applicable' in the site implementation document column.

Sites are to refer to appropriate EA and other relevant guidance in implementing compliance arrangements.

Note: The listing of Company-wide requirements cannot be altered without the agreement of the Head of Profession Environment & Waste and re-issue of F-318.

6 Abbreviations

BAT/BPM	Best Available Technique/Best Practicable Means
DEFRA	Department for Environment, Food and Rural Affairs
EA	Environment Agency
EMS	Environmental Maintenance Schedule
EPR 2016	Environmental Permitting Regulations SI 2016/1154
HASS	High Activity Sealed Sources (as under the Environmental Permitting Regulations SI2016/1154, Schedule 23, Part 5 (as amended))
IRR17	Ionising Radiation Regulations SI 2017/1075
OQAP	Operational Quality Assurance Programme
PCB's	Polychlorinated biphenyls
SMS	Statutory Maintenance Schedule
SOI	Station Operating Procedure
SQEP	Suitably Qualified and Experienced Persons

Note: On 6 April 2010 the Water Resources Act 1991 and large parts of the Radioactive Substances Act 1993 were repealed by the introduction of the Environmental Permitting Regulations. In some cases, the requirements of the existing Consent / Authorisation remained unchanged, and these should be referred to as 'Environmental Permits' or 'deemed Environmental Permits'. These documents will in time be replaced by Environmental Permits.

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7 Records

Records for compliance with regulations and company requirements shall be managed in accordance with PD-023: **Knowledge and Information Management.**

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8 Compliance Matrix**8.1 Radioactive Waste – REMOVED AS NOT RELEVANT TO DfR APPLICATION****8.2 Water Discharge Activities- REMOVED AS NOT RELEVANT TO DfR APPLICATION****UNCONTROLLED IF PRINTED**

8.3 Deposit for Recovery (DfR) EPR Permit

Item	DfR Permit Compliance Requirement	Company-Wide Implementation Documents <i>Italics denotes Harwell/Winfrith document alternative to be used until such time as combined standard procedures in place</i>	Site Implementation Documents
DfR Activities			
Note: <ul style="list-style-type: none"> The EPR Permit sections 1-10 only need to be fully completed when sites have been issued with full EPR permits related to non-radioactive activities. Transfer applications only results in an Introductory Note being issued with an EPR permit number, whilst existing limits and conditions of deemed permits remains. In this case, a reference to the site document detailing the compliance arrangements for the deemed permit is sufficient. Refer to EA guidance 'How to Comply with your Permit' EPR.100 for guidance on what is required by the permit conditions, limits, and rules. In addition, refer to relevant specific guidance such as that that applies to water discharge activities (also refer to the Water Directive 2006/60/EC), waste (also refer to Waste Framework Directive 2008/98/EC) and IPPC Directive 2008/1/EC installations. 			
1.	EPR 2016 Permit: 1.1 General Management,	M-031 Site Manual for Trawsfynydd Site PD-010 Management Systems S-276 Management of the Organisational Baseline PD-020 Learning & Development PD-018 Engineering Delivery. S-419 Creation, Storage and Management of Records S-495 Categorisation and Notification of Events MCP-019-01 Preparation, Management and Implementation of the Maintenance Schedule / <i>MAN 0010 Maintenance Manual / PRC 0201 Identification of Environmental Controls</i> PD-026 Management of Waste PD-012 Environmental Management S-080 Environment Suitably Qualified and Experienced Persons PD-001 Asset Management	TRAWS-PD-12-001 Trawsfynydd Site Interface to Company PD-12 TRAWS-PD-026-001 Trawsfynydd Site Interface to Company PD-26 TRAWS-MCP-099-005 Trawsfynydd Site Specific Arrangements TRAWS-ES TRAWS-F-620 Trawsfynydd Site Record Schedule

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Item	DfR Permit Compliance Requirement	Company-Wide Implementation Documents <i>Italics denotes Harwell/Winfrith document alternative to be used until such time as combined standard procedures in place</i>	Site Implementation Documents
DfR Activities			
2.	EPR 2016 Permit: 1.2 Avoidance, recovery and disposal of wastes produced by the activities	PD-026 Management of Waste S-100 Management of Controlled Waste	TRAWS-PD-12-001 Trawsfynydd Site Interface to Company PD-12 TRAWS-PD-026-001 Trawsfynydd Site Interface to Company PD-26 Traws-SI-WMD-002 Site Instruction Management of Hazardous and other Controlled (Non-radioactive) Waste Traws-WMDDI-016-3203 Guidance for the Re-use of Material on Site
3.	EPR 2016 Permit: 2.1 Permitted Activities	PD-018 Engineering Delivery PD-026 Management of Waste PD-008 Control of Work PD-012 Environmental Management	TRAWS-PD-12-001 Trawsfynydd Site Interface to Company PD-12 TRAWS-PD-026-001 Trawsfynydd Site Interface to Company PD-26 TRAWS-MCP-099-005 Trawsfynydd Site Specific Arrangements Traws-SI-WMD-002 Site Instruction Management of Hazardous and other Controlled (Non-radioactive) Waste Traws-WMDDI-016-3203 Guidance for the Re-use of Material on Site TRAWS-F915 Interim inert material stockpile record sheet Traws-WMDDI-016-3201 Waste Management Facilities: Access, General Operations, and Inspection of Waste Storage areas.
4.	EPR 2016 Permit: 2.2 Waste Recovery Plan	PD-018 Engineering Delivery	Traws-SI-WMD-002 Site Instruction Management of Hazardous and other

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Item	DfR Permit Compliance Requirement	Company-Wide Implementation Documents <i>Italics denotes Harwell/Winfrith document alternative to be used until such time as combined standard procedures in place</i>	Site Implementation Documents
DfR Activities			
		PD-026 Management of Waste	Controlled (Non-radioactive) Waste TRAWS-ES TRAWS-F-620 Trawsfynydd Site Record Schedule
5.	EPR 2016 Permit: 2.3 Operating Techniques	PD-026 Management of Waste	TRAWS-PD-12-001 TRAWS-PD-026-001 Traws-SI-WMD-002
6.	EPR 2016 Permit: 2.4 The Site	PD-026 Management of Waste	TRAWS-PD-12-001 TRAWS-PD-026-001 Traws-SI-WMD-002
7.	EPR 2016 Permit: 2.5 & 2.6 Waste Acceptance	PD-026 Management of Waste	TRAWS-PD-12-001 TRAWS-PD-026-001 Traws-SI-WMD-002 TRAWS-F-620
8.	EPR 2016 Permit: 3.1 Emissions of substances not controlled by emission limits	PD-018 Engineering Delivery S-495 Categorisation and Notification of Events PD-026 Management of Waste PD-008 Control of Work	TRAWS-PD-12-001 TRAWS-PD-026-001 TRAWS-MCP-099-005 TRAWS-F1655 TRAWS-CONT-HBK TRAWS-LSI-14-4-008
9.	EPR 2016 Permit: 3.2 Odour	PD-026 Management of Waste PD-012 Environmental Management	TRAWS-PD-12-001

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Item	DfR Permit Compliance Requirement	Company-Wide Implementation Documents <i>Italics denotes Harwell/Winfrith document alternative to be used until such time as combined standard procedures in place</i>	Site Implementation Documents
DfR Activities			
10.	EPR 2016 Permit: 3.3 Noise and vibration	PD-012 Environmental Management	TRAWS-PD-12-001
11.	EPR 2016 Permit: 4.1 Records	S-419 Creation, Storage and Management of Records S-504 Production of Company Documents S-505 Company Document Management S-506 Site Document Management <i>PRC 0010 Management System Change and Document Control / STD 0103 Document Control</i>	TRAWS-PD-12-001 TRAWS-PD-026-001 TRAWS-F-620 TRAWS-F915 Interim inert material stockpile record sheet
12.	EPR 2016 Permit: 4.2 Reporting	S-419: Creation, Storage and Management of Records S-067 Preparation of Returns Providing Information Required by Environmental Permits to the Environment Agencies S-068 Interactions with Regulators	TRAWS-PD-12-001 TRAWS-PD-026-001 TRAWS-F-620
13.	EPR 2016 Permit: 4.3 Notifications	S-495 Categorisation and Notification of Events S-047 Spillage and Release Index PD-026 Management of Waste	TRAWS-PD-12-001 TRAWS-PD-026-001
14.	EPR 2016 Permit: 4.4 Interpretation	PD-026 Management of Waste	TRAWS-PD-12-001 TRAWS-PD-026-001

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8.4 Transport of Waste REMOVED AS NOT RELEVANT TO DfR APPLICATION**UNCONTROLLED IF PRINTED**