

Introduction

The purpose of this notice is to initiate the consultation period to introduce the latest LLWR disposal Waste Acceptance Criteria (WAC), the subsequent amendments to the Waste Acceptance Process (WAP) forms, and to communicate the implementation process.

LLWR's new Environmental Permit, which is underpinned by the 2011 Environmental Safety Case, came into effect on the 1st November 2015. In light of this, and to incorporate learning from experience of WAC 4.0, the LLW Disposal Waste Acceptance Criteria document has been updated and is now available on the [Customer Consultation webpage](#). The latest WAC has resulted in a number of amendments to the Waste Enquiry (WEN), Waste Characterisation (WCH), Waste Consignment Information (Disposal and Supercompaction) (WCI) and Waste Consignment Variation (WCV) forms, which will also be posted on the [Customer Consultation webpage](#) later in March. The forms will ensure we collect all the data required to support our Environmental Safety Case and Permit. They will also be compatible with the new Waste Tracking System.

Our goal is to make the transition to full compliance with the revised Environmental Permit before October 2016, to meet regulatory expectations and also ensure that consignors are in a position to use the new Waste Tracking System. The main changes to each document are listed below.

Changes to the LLWR Disposal WAC

- The general conditions of acceptance distributed throughout the Introduction in WAC 4.0 have been compiled into section L1 – General Conditions of Acceptance. This does not introduce any new conditions, nor does it remove any existing conditions.
- Condition L2.5 Reactive Metals and Materials has been reworded, but the intent remains unchanged.
- Condition L1.13 Chemical Complexing or Chelating Agents has become condition L2.13, which now allows controlled disposal of such agents. Two categories have been introduced: Category 1 materials that will only be permitted in quantities less than Bulk Chemical Compound quantities in waste; and Category 2 materials that will require a capacity allocation.
- Condition L1.17 Hazardous Waste, Hazardous Substances, and Non-hazardous Pollutants has become condition L2.17 and the lists of materials in Categories 1 and 2 have been amended. Steels have been added to Category 1. Electronic and Electrical Equipment has been introduced into Category 2 with five subdivisions specified in the relevant tables in the WCH and WCI. The objective of these last two changes is to reduce the amount of information customers need to provide on composite materials.
- An additional condition, L2.18 Asbestos and Man-Made Mineral Fibres (MMMMF), has been introduced with acceptable limits being specified according to how friable the material is. This condition now allows the disposal of a range of asbestos wastes without a need for a variation.
- The uranium isotopes previously distributed across Discrete Items groups B1 and B2 have been consolidated into group B1, i.e. all alpha-emitting uranium isotopes, U-233, U-234, U-235, U-236, U-238 and all mixtures thereof are captured in group B1 and the limit for group B2 has been increased to 0.3GBq for items with mass of 1kg or less, 300 GBq/t for items between 1kg and 100kg, and 30GBq for items with a mass 100kg or greater.
- L2.6 Sealed sources has been replaced by L3.2.4 Low-activity Sources, which are grouped using the same allocations used for discrete items, and the limit calculated according to a sum of fractions style formula. This revision allows the disposal of a wider range of low-activity sources.

Changes to the Waste Enquiry Form

- Tick boxes for Yes/No have been replaced with Yes/No drop down boxes for compatibility with the future Waste Tracking System.
- The site code included in section 1, Customer Information for compatibility with the future Waste Tracking System. (Site Code and Customer Code are drop down lists for selection)
- The list of compliance questions in section 4, Waste Information has been extended to ensure coverage of the LLWR disposal WAC.
- Additional fields are included in the Waste Item Register for hazardous substances, POPS, EWC codes, Hazardous statement codes.

Changes to the Waste Characterisation Form

Waste Information worksheet

- A table for volume and weight to be distributed across incineration, metallic, VLLW, supercompaction and LLW routes has been added to the Proposed Waste Routing section.

Wastestream Totals worksheet

- The hazardous waste table has been changed to reflect the lists in L2.17.
- The volume field has been removed. The table has fields for mass and form.
- A table has been added for chemical complexing and chelating agents.
- A table has been added for asbestos with fields for the mass of asbestos, a description and the type of asbestos.

Changes to the Waste Consignment Information Form (Disposal and Supercompaction)

Consignment Information worksheet

- A field has been added for the Waste Loading Plan Reference in section 2.

Supporting Information worksheet

- Wording on the 2nd, 8th and 12th questions in the WAC Compliance questions section has been changed to reflect the new WAC wording.

Hazardous Waste, Hazardous Substances and Non-Hazardous Pollutants worksheet

- The Category 1 and 2 material lists have been updated to reflect the lists in L2.17.
- The mass and form of each Category 1 and 2 materials are required by wastestream.
- A table for chemical complexing or chelating agents has been added with data fields by wastestream.
- A table for asbestos and MMMF wastes has been added with data fields by wastestream.

A new worksheet has been added for low-activity sources.

The volume of data and additional checks mean that we will confirm receipt of the form within 5 working days, with a target to respond with the outcome of the checks within 15 working days.

Changes to the Waste Consignment Variation Form

This form has been converted from a “word” document to an Excel worksheet to be compatible with the new Waste Tracking System.

Implementation Process

This notice initiates the consultation process in accordance with the Waste Services Contract, running until 13th May 2016. During this period we intend to hold two workshops to consider the WAC and the forms on 26th April 2016 and 4th May 2016, and invite formal comments in writing, to be sent to: customerteam@llwrsite.com, by 13th May 2016. The criteria in the WAC are derived from the LLWR ESC, nuclear safety case, and transport regulations and are required in permit and licence documents. However, the consultation is an opportunity to clarify understanding and enhance wording in the WAC. Similarly, the data requirements in the forms are derived from permit and licence requirements. There is limited ability to change the layout of the forms because the Waste Tracking System has been configured around the current documents; that said, layout and usability enhancements that can be incorporated will be considered.

By way of transition the new WEN, WCH, and WCI will be available from June 16 and we will accept them from that point on but we will continue to accept the old forms until the end of August 16. However, when the new Waste Tracking System goes live, which is expected to be in September / October 2016 all submissions must be on the latest versions of all forms with a full data set. WCI's for non-compliant consignments and/or consignments without a full data set will not be approved. WCV's will not be approved to vary this requirement.

We hereby encourage you to consider the impacts of the changes on your processes and systems at the earliest opportunity and notify us, via the customerteam@llwrsite.com email, if you foresee any difficulties complying, or complying within the timescales articulated in this notice. Our goal is to assist you with the transition and wish to see continued movement of waste for treatment and disposal wherever possible. We are willing to co-ordinate implementation across the LLWR customer base, but we are not in a position to develop or manage implementation plans on behalf of customers. You will need to prepare your own implementation plans and track progress against them. It would be helpful if you are able to share the implementation plans and report progress to us so we can monitor the impact of this change and the final implementation date.

The Waste Tracking System project team is assessing the impact of these changes on the project and will communicate project updates separately.

Further Information and Questions

If you require any further information or have any queries relating to this Customer Notice, please send an e-mail to: customerteam@llwrsite.com or call: Andy Bicknell on 019467 70291.

Distribution List

We have issued this Notice to the following people from your Company's Contact Details Form (Reference: WSC-FOR-CON):

- All nominated representatives

If you need to update these details, please submit a revised Form: <http://llwrsite.com/customer-portal/resources>