

## **Guidance on completing the HASS record form (EPR-RSR10)**

### **Making and Amending Records**

#### **1a Date record made**

#### **1b Replaces record made on**

#### **1c Amends information about**

Most of the information you record about each source will not change during the time you keep that source.

You will need to make new, replacement records and report those changes to us if you:

- apply for and receive a new permit;
- change the equipment in which a source is kept;
- intend to keep, use or store a source permitted for mobile use at another location for longer than three months;
- transfer the source to someone else;
- lose, have stolen or recover a source;
- need to correct information you have reported before.

### **Sending 'confirming' reports**

We also need to have regular and positive confirmation that you continue to be the holder of a source. You need not, of course, submit a confirming report if you have already told us that the source has been transferred to someone else.

You must send us a 'confirming' report at intervals of 12 months after the HASS was first received.

If you have already submitted a replacement record, for one of the reasons set out above other than a transfer to someone else, before that 12 month period ends, you

should nevertheless send a 'confirming' report – containing the latest version of your record for that HASS - at the anniversary. Annotate 1c as 'annual confirmation'.

For some HASS holders, it may be more convenient to submit confirming reports for all relevant sources on a fixed date each year. If this is what you want to do, you should ask your regulator to include in your permit the alternative condition which is available for that purpose.

For clarity, to ensure that a changed record can be clearly linked with the record it replaces and to make plain what changes you are reporting, these parts of the record allow you to confirm when and what changes have been made. At 1c, your first report about a HASS should be marked as such. In subsequent reports, list the record items now being changed.

#### **1d Below exemption level on**

We need to know when the HASS to which this record relates has decayed below the relevant threshold level.

When it has, please complete this section with that date.

#### **1e Contact name for this record**

#### **1f Contact telephone number**

We may need to speak with you to confirm the detail of your report. If your report is complete and clear, we will not.

### **Identifying the source**

#### **2a Source identifying number**

Source manufacturers should supply customers with a document confirming the identifying number inscribed on the source. The intended holder should not accept delivery of a source from a source manufacturer, supplier or previous holder without appropriate accompanying documentation confirming this and other information.

You must record the identifying number as supplied. You should not try to confirm its accuracy by examining the source itself.

#### **2b Name of Source Manufacturer or Supplier**

#### **2c Address of Source Manufacturer or Supplier**

Outside the European Union

The manufacturer of the source may be located outside the European Union.

Record the name and address of the importer or supplier instead.

The intention is to identify a European 'entry point' at which a source first enters a regulatory and record system maintained within one of the member states. Its movements, until it leaves that system of control, can then be tracked and transfers reconciled. As yet, no truly international tracking system exists and these arrangements seek to make the most of the current arrangements.

Manufacturer or supplier

Add either [M] or [S] to the name recorded at 2b to confirm whether this is the manufacturer or the supplier.

Enter 'Not known' for older sources whose provenance is uncertain, providing you have made reasonable efforts to discover these details

## **2d Equipment identifying number**

Linking source to equipment

Other than during the manufacturing process, sources will usually be installed in some form of equipment, for example a gauge, irradiator, exposure assembly, storage or transport container.

It is important to associate each source with the equipment in which it is currently installed. Sources are commonly delivered in a transport container for subsequent installation into equipment.

Record the identifying number of your equipment.

Amend that record if you later move the source to different equipment.

You do not need to report changes to us when they are of very short duration.

Sources which are delivered in equipment

Some sources are delivered in equipment and may remain there throughout their working life. Equipment should come from its manufacturer, supplier or previous holder with documentation confirming the equipment's identifying number together with confirmation of the source it contains.

Confirm that the equipment identifying number supplied to you matches that marked on the outside of the equipment.

Record that number.

If you hold sources not installed in equipment, mark this section as 'not applicable'.

## **2e Equipment manufacturer**

### **2f Equipment manufacturer's address**

You may acquire equipment for which the original manufacturer is not known. You should make reasonable efforts to confirm this information.

If necessary, confirm that the manufacturer is 'not known'.

If the manufacturer of the equipment is located outside the European Union, record the name and address of the importer or supplier instead. Add [I] or [S] to the name you record at 2e.

### **2g Practice**

### **2h Associated activity**

Please complete these sections by confirming the practice and activity for which this source is to be used – consistent with the description used in your application.

## **Identifying the HASS holder**

We need to know clearly who you are. This is so that we can avoid confusion between you and other organisations of similar name – and between different parts of your own organisation, which may hold and manage sources at different locations.

We also need to be certain who has responsibility for sending records to us.

### **3a Holder's name**

Please record the name of your organisation, as used when applying for the permit to hold a source of this type.

### **3b Holder's address**

Confirm your registered office or principal place of business, not the current location of the source. Please ensure this matches the address on the face of your permit.

### **3c Organisation identifier**

Many HASS holders will be businesses who have had to register with Companies House for other purposes.

If this applies to you, record your Companies House registration number here.

### **3d Type of Holder**

Please confirm here whether you are holding this source because you are its manufacturer, a supplier, a user or because you are storing the source.

### **Location of HASS**

#### **4a Use**

If this source has been authorised under Schedule 23, Part 2, paragraph 5(5)(a) of EPR, record this source as mobile.

#### **4b Usual source location**

Record here the address of the premises where you usually keep or use the source – which will be the same address as confirmed on the face of your permit. If the source will only be used at these premises, you should record it as fixed at 4a.

#### **4c Other source location**

If the source is, or is likely to be, kept at another, single location for longer than three months, please record that address here.

We or the police may wish to inspect your arrangements at any of the locations where you keep or use the source. But, to allow us to plan our visit programme, we need to know when the source is being kept or used for an extended period at somewhere other than its usual location.

### **Your permit**

#### **5a Permit number**

#### **5b Date it became effective**

#### **5c Date of expiry**

We, of course, already know this information but it will be helpful to us and allow you to keep clear records if we ask you to confirm the details here.

Record here the reference number on the face of your permit, together with the date it became effective.

In some cases, we have issued permits which are time-limited and if this applies to your permit, record the date here.

## **Operational information**

This section is to enable you to record source leakage tests - events that are important in demonstrating compliance with the requirements of your permit. We will not record this information. When you amend a record to reflect a recent leakage test you need not report this to us unless you are also telling us of other changes.

Your permit requires you to maintain a record of source movements within your premises and, where the permit allows mobile use, to and from other locations. You will need to keep separate records for those purposes – you should not report those movements.

## **Characterise the source**

The information you provide here will help us to identify sources that are lost or are found and may be important in responding to an incident involving this source.

### **7a Radionuclide**

Please specify this in the form cobalt-60, iridium-192, etc.

### **7b Date of Manufacture**

### **7c Activity at that date**

### **7d Other reference date**

### **7e Activity at that date**

One purpose of this section is to record a date on which the activity of the source can be confirmed and, therefore, allow the activity at any later date to be calculated.

This may be specified for a reference date, which is not necessarily the date of manufacture. But the date of manufacture is of further importance, as it defines the age, rather than activity, of a source – useful where a comparison with its designed working life is of relevance.

Please record all the available information relevant to this section. Please use the standard scientific prefixes and the abbreviation Bq.

### **Further Source Characterisation details**

These items are optional - where a source has been manufactured to ISO 2919 most of this information will be contained within the certificate supplied with the source.

## **7f Physical & Chemical Characteristics**

Where concise information is available, for example 'Cs Cl' pellet in double stainless steel capsule', please record it here.

Where further information is held, you may wish to retain this separately. Otherwise, please record 'not known'.

## **7g Source Type**

We are not aware of a comprehensive, industry-wide type classification scheme which might be adopted here.

Where known, please record here the 'model number' assigned by the manufacturer.

## **7h Capsule Identification**

### **7i ISO classification**

### **7j ANSI Classification**

Where this information is available to be recorded, it will be of alphanumeric form. Record it as such.

### **7k Special Form certificate number**

### **7l Date of expiry of Special Form Certificate**

This certificate affects the type of container necessary to transport the source. Where you are able to complete this section you should do so, as it may be of value in some responses to events involving the source.

## **Receipt of HASS**

### **8a Date of Receipt of this Source**

Please record here when you first received the source or equipment from the manufacturer or your supplier or previous user.

### **8b Name of Consignor**

### **8c Address of Consignor**

### **8d Type of Consignor**

Please record the consignor's declared name and address.

Also record whether the consignor is the manufacturer of this source or equipment, its supplier or a previous user.

If you have already supplied this information in Section 2 put 'As Section 2'.

## **Source transfer**

### **9a Date of Transfer of this Source**

Where appropriate, please record here the date when you transferred the source or equipment to the management of another organisation.

### **9b Name of Recipient**

### **9c Address of Recipient**

### **9d Type of Recipient**

### **9e Recipient's Permit Number**

Please record the recipient's declared name and address.

Record whether the recipient is:

- a manufacturer of HASS or equipment containing HASS;
- a supplier of HASS or equipment containing HASS;
- the next user of this source or equipment;
- a person permitted for short-term storage of waste sources;
- someone who will recycle the source;
  
- a facility on a nuclear-licensed site for long-term storage or disposal of waste sources.

We also require you to obtain and record the intended recipient's permit number under which it will keep this source, if that user is within the European Union. We will expect to see a complementary report from that new user, if it is in the UK, which will allow us to reconcile our records.

Where you pass a source to a carrier for delivery to the intended recipient, you should not report this as a separate, intermediate transfer.



## **Further information**

This section is only for completion when a relevant event has happened. Conditions of your permit already mean that you must notify us promptly of unusual events of this sort.

But you need also to amend your record and report that change to us – a reporting requirement in addition to the existing need for prompt notification

### **10a Date of Loss**

### **10b Date of Theft 10c**

### **Date of recovery**

### **Record relevant dates.**

These details will allow our records to readily identify sources which at any time are not under management controls.

## **Submitting your form**

Please send all parts of your form to:  
Permitting Team Leader (Regulated Industry)

Natural Resources Wales

5th Floor, Cambria House

29 Newport Road

Cardiff

CF24 0TP