

CHAPTER 11

RECORD KEEPING

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INTRODUCTION

1 The keeping of many radiation records is a statutory requirement and within legislation the timescales for which records have to be kept are also specified. MOD policy on record keeping is to keep records for the statutory period unless otherwise specified in this chapter. For ships, units and establishments which are not part of the nuclear programmes further detail is given in Volume 2 of this JSP. Other guidance is contained in JSP 375 and in statements issued by DG Info.

DOSIMETRY RECORDS

2 There is a statutory requirement for radiation dose records to be kept in accordance with the Ionising Radiations Regulations 1999, REPIR and Ionising Radiations Regulations (Medical) 2000, their associated Codes of Practice and Guidance Notes. Periods of record retention and those who are to keep the records, for example an HSE Approved Dosimetry Record Keeping Service (ADRKS), are often specified in the regulations. There may also be additional timescales contained within authorisation conditions for MOD's nuclear facilities. However, the statutory requirement for retaining records is mostly directed at ensuring that current arrangements are in place for radiation protection. This policy specifically covers historical records.

3 Radiation dose records for Unclassified Radiation Workers are to be kept by the ADRKS or the employer where they are held locally indefinitely so that they are available in the event of a compensation claim or a request for radiation worker counselling.

RECORD RETENTION

4 MOD policy is that all MOD units, including Dstl and other MOD Agencies are to retain, both for service and civilian personnel, all primary records (see Annex to this chapter) except those records held on their behalf by the Approved Dosimetry Service (ADS). Issue lists and laboratory certificates are to be kept for the period specified by the ADS.

5 Similarly, all MOD units, including Dstl and other MOD Agencies are to retain the supporting documents (see Annex to this chapter) for the statutory laid down periods. At the end of these periods these organisations will undertake an assessment of the relevance of retaining these documents for supporting or refuting future claims. The Radiation Protection Adviser (RPA) and ADS should be consulted where doubt exists as to the future relevancy of retained documents, equally the originating author or its successor organisation should be consulted regarding the relevance of retaining associated historic documents. It is expected that in most circumstances the decision will be to retain the documents. In such circumstances such documents are to be archived following standard MOD procedures. Where on the basis of a risk assessment a decision is taken to destroy such records, the Commanding Officer or Head of Establishment, may be held accountable for this action in the event of a claim arising against MOD for work undertaken in his business area for which records no longer exist.

6 Leaflet 39, Annex E provides retention times for current records.

MOD AGENCIES

7 MOD Agencies, including Dstl, will hold both primary and supporting historic documents (see Annex to this chapter) for their predecessor organisations. These documents become the responsibility of these Agencies. Agencies may arrange by mutual agreement and the transfer of financial provision to other MOD business areas for these areas to take over their responsibilities. This will be achieved by written agreement.

CLOSURE OF SITES

8 The following information must be made available, if not previously made available, to Defence Estates at handover of a site following closure. The Commanding Officer or Head of Establishment is responsible for ensuring that the following documents are provided as appropriate.

8.1 Radioactive Substances Clearance Certificates relating to the site.

8.2 Reports pertinent to the storage of radioactive sources on site.

8.3 Radiological survey reports, internal and external to buildings.

8.4 Reports pertinent to historical radiological contamination remediations, internal and external to buildings, and the final destination of any remediated radioactive material be it on, or off site.

8.5 Reports relating to on-site disposal of radiological sources including landfilling and burning grounds.

9 For sites that are to close and whose function is not to be transferred to another MOD organisation or Agency they are to forward their records, having removed any records that are already held by the ADRKS (usually Dstl Environmental Sciences Department (Dstl ESD) Approved Dosimetry Service) to the MOD archive, as is the case with other preserved establishment documents. Dstl ESD and the Directorate of Safety and Claims (DS&C) are to be informed when this occurs and they are to be supplied with the references provided by the archives so documents can be withdrawn from the archives at a future date should they be required. It is recognised that this may lead to delays in responding to Compensation Scheme claims. The amount of delay will correspond to the time taken to withdraw the historic records from archives.

10 Where Dstl ESD considers it appropriate for the records to be entered electronically on the Dosimetry Index and Database (DOSIND) they will notify DS&C. DS&C will continue to populate the DOSIND database with the limited funds it has at its disposal. Priority will be given to documents from those organisations from whom most claims have been made under the Compensation Scheme.

PRIVATISED COMPANIES

11 Privatised companies and Government owned contractor operated sites e.g. the Royal Dockyards and AWE Aldermaston, often hold on their sites individuals' historic radiation dose records, other associated documents relating to their work, administrative arrangements and other records prior to vesting day. Such companies are under contract to provide services to MOD business areas. These business areas, or their successors where they cease to exist, are the organisations responsible for the companies' maintenance of such records, usually through the contract, and for their financial provision. Such companies may arrange by mutual agreement and the transfer of financial provision for other MOD business areas to take over such responsibility.

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CHAPTER 11 ANNEX A

RECORDS OF INTEREST – PRIMARY AND SECONDARY (SUPPORTING) RECORDS

PRIMARY RECORDS

1 Records of interest can be conveniently divided into primary records and supporting records. Primary records are those that will be required to support claims brought under the Compensation Scheme for Radiation Linked Diseases, war pensions, personnel radiation protection litigation and radiation worker counselling. The list below includes such records. The list is not exhaustive. Individual personal radiation dose records for classified and non-classified workers generated by an Approved Dosimetry Service (ADS) and maintained by them.

1.1 Records of personal dose generated from locally issued dosimetry.

1.2 Dose information for individuals working under a written system of work, or equivalent, based upon workplace dose rates (e.g. radiation surveys of controlled and supervised areas) and length of exposure.

1.3 Whole body monitoring results not entered into the ADRKS record.

1.4 Accident and incident investigation reports made for the purposes of Regulations 28 and 29 of the Ionising Radiations Regulations 1985 and the regulations listed in paragraph 2 below.

1.5 Accident and incident investigation reports not covered by (1.4) above which occur in a controlled or supervised areas.

1.6 Summaries produced in support of the Compensation Scheme, war pensions or radiation worker counselling.

1.7 Radon assessments in radon affected areas that may be used to estimate the radiation exposure of members of the MOD workforce.

1.8 Health registers.

SECONDARY (SUPPORTING) RECORDS

2 Supporting documents are those which may be needed for claims brought against MOD through the courts by workers and former works claiming ill health which they attribute to their occupational exposure to ionising radiation. The list below includes the following records which is not exhaustive:

2.1 Site and process risk assessments, their reviews and updates or amendments.

2.2 Local rules and/or local orders.

2.3 Records of controlled and supervised areas.

2.4 Radiation and contamination monitoring surveys in such areas.

2.5 Safe operating procedures, permits to work and systems of work (and equivalent).

2.6 Maintenance and examination and testing records including ventilation, respiratory and other personal protective equipment.

2.7 Environmental monitoring records.

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