



guardians of drinking water quality

DRINKING WATER INSPECTORATE

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DWI Information Letter 1/2005

To: Board Level Contacts of Water and Sewerage Companies in England and Wales

Dear Sir or Madam

REQUIREMENTS FOR MONITORING RADIOACTIVITY IN WATER SUPPLIES

Purpose

1. To clarify the requirements for compliance monitoring of radioactivity under the Water Supply (Water Quality) Regulations 2000¹ (the Regulations) and to outline how companies may seek to reduce the requirement to monitor their supplies.

Background

2. The Regulations require water companies to monitor their supplies for both total indicative dose and tritium. In practice, routine monitoring for total indicative dose is achieved through screening for gross alpha and gross beta. Therefore water companies must conduct routine compliance monitoring of their supplies for gross alpha, gross beta and tritium. Normally this will be done at treatment works at the audit frequency specified in Table 3 of Schedule 3 of the Regulations, though companies may choose to monitor in supply zones at the audit frequencies in Table 2 of Schedule 3.
3. The only exemption to this requirement is if the Company has received a notice under regulation 6(7) from the Inspectorate indicating that tritium and/or total indicative dose need not be monitored. To date no such notices have been issued.
4. The Interim Guidance on the Regulations, dated September 2003, is perhaps not as clear as it could be in respect of what monitoring is

¹ 2001 in Wales

required and under what circumstances companies may revert to operational monitoring for radioactivity. This is largely because the EC have not clarified the monitoring required. Some companies may have interpreted this advice as indicating they need not conduct compliance monitoring for tritium and/or total indicative dose (in practice gross alpha and gross beta). This is not the case. Wherever there is apparent inconsistency between the Regulations and the Guidance, companies should follow the Regulations. The Guidance does not purport to offer any authoritative interpretation of the Regulations.

The Way Forward

5. The Inspectorate's accepts that, in good faith, some companies may have been conducting operational monitoring for radioactivity during rather than compliance monitoring. In light of these considerations and the fact that this is a new requirement the Inspectorate will adopt a flexible approach to sampling shortfalls for radioactivity during the 2004 calendar year and the first quarter of 2005. Assessment will be made on a case by case basis, taking on board the approach adopted by individual companies.
6. From April 2005 onwards all companies must conduct compliance monitoring for radioactivity unless they have received a regulation 6(7) notice from the Inspectorate. Many companies may wish to continue to remain on compliance audit monitoring and to gather further data and therefore need take no further action. Should any companies not wish to conduct compliance monitoring after 1 April 2005 they will need to apply for a notice under regulation 6(7).

Applications for notices under regulation 6(7)

7. Applications for notices under regulation 6(7) valid from 1 April 2005 must be submitted to the Inspectorate before 28 February 2005. Applications must include the name of the treatment works or supply point for which the notice is requested, a summary of the likely presence of natural or artificial sources of radioactivity within the catchment, results of all radioactivity monitoring for gross alpha, gross beta and tritium conducted at the works or supply point, together with results of and further radiological investigations conducted in response to values in excess of the specifications.
8. If a company considers it has already supplied sufficient information to the Inspectorate, it should submit a letter indicating the date of the submission and to whom the information was sent.
9. The Inspectorate will assess any applications made and for those where there is sufficient evidence that the levels are well below the specification, will issue notices for tritium and/or total indicative does as the case may be.

10. In future, in order to simplify the sampling frequency assessment, the Inspectorate only proposes to issue notices under 6(7) that start on 1 January of a particular year. Therefore, should a company request a notice valid from 1 January of any future year, the application should be made by 30 November of the year prior to which the notice takes effect.

Operational monitoring

11. If companies receive a notice under Regulation 6(7) allowing them not to monitor for radioactivity, they are strongly advised to establish an operational monitoring programme. Should a sample taken under the operational monitoring programme fail to meet the specification, the Company must investigate and notify the Inspectorate of the outcome of the investigation, in accordance with regulation 18.

Enquiries

12. Any general enquiries on this letter and applications for notices should be addressed to Pete Marsden (020 7082 8047).

13. Copies of this letter are being sent to Pamela Taylor, Chief Executive, Water UK; Richard Wood, Water Supply and Regulation Division, Department of the Environment Food and Rural Affairs; June Milligan, Environment Division, the National Assembly for Wales; Tim Hooton, Government Regulator for Drinking Water Quality, Scotland; Randal Scott, Drinking Water Inspectorate for Northern Ireland and Rowena Tye, Office of Water Services.

14. This letter is being sent electronically to Board Level contacts. Please acknowledge receipt by email to dwi.informationletters@defra.gsi.gov.uk. Hard copies are not being sent. This letter may be freely copied.

Yours sincerely



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Chief Inspector
Drinking Water Inspectorate