

DS 379 – Comments from Australia

COMMENTS BY REVIEWER				RESOLUTION			
Reviewer: Alan Melbourne (comments from ARPANSA and other Australian stakeholders)							
Country/Organization: Australia/ARPANSA		Date: 31 May 2010					
Comment No.	Para/Line No.	Proposed new text	Reason	Accepted	Accepted, but modified as follows	Rejected	Reason for modification/rejection
1.	Para 1.23	<p>Delete this paragraph</p> <p>If the paragraph is to be retained, it is suggested that it be reworded as follows:</p> <p><i>The system of protection and safety in these standards includes protection against exposure to radon which is based on the average level of risk to a population with typical but various smoking habits. Because of the synergistic effects of smoking and exposure to radon, radiation protection approaches should consider public and worker acceptable means to reduce the dominant contribution from smoking to radon risk.</i></p>	<p>The ICRP position on radon and smoking is still not clear, and the paragraph makes recommendations that are more suited to a Safety Guide rather than an introduction to a Requirements document. Although it is admirable that the drafters of the document want to address the biggest cause of cancer (smoking) the means of controlling the much smaller radiological component is still under scientific debate and is not mature enough for inclusion in the BSS. The statement of twenty times risk could be taken out of context and result in either unwarranted public or worker concern and potentially give rise to future litigation risks. Until a well developed process for handling the difference between smokers and non-smokers is approved through appropriate bodies (ICRP) a statement like this should not be in the BSS.</p>				
2.	2.46, Req.	Change 'principal parties' to	For consistency with other				

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3.	5 & 2.47-2.51 3.4(a)	‘relevant principal parties’. Change the first use of “activity” to “practice”.	sections. Not all principal parties are responsible for each requirement. Activity is used twice in this paragraph with two different meanings. The paragraph refers to 3.1 which uses practices.				
4.	Req. 9 & 3.13 – 3.15	Change ‘Registrants and licensees’ to ‘Relevant principal parties’	For consistency with Req. 4 & 2.40 – 2.46.				
5.	3.20	Change “shall normally deemed” to “shall normally be deemed”	Word missing				
6.	Req. 11	The regulatory body shall establish requirements for optimization of protection	The current wording says the same thing twice.				
7.	3.21	Change “safety, to require” to “safety, require”	Editorial correction				
8.	3.28-3.34	These paragraphs sometimes	Inconsistency				

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9.	3.59	refer to “persons or organizations” and elsewhere to “registrants and licensees”. It should be made consistent. Is disposition the right word here? Should it be disposal?	Meaning unclear				
10.	3.61(f)	Delete “during the intended period of use”	Words do not appear to be relevant to the rest of the paragraph				
11.	3.64	Change “occupational” to “employment”	Causes confusion with occupational exposure				
12.	3.64	Is this paragraph meant to be public exposure?	While paragraph 3.65 clearly states that it relates to public exposure, 3.64 does not. The system of protection is meant to encompass all types of exposure and it should be made clear where this type of exposure fits.				
13.	3.64	Amend ‘medical staff’	Should be consistent with terminology used in 3.143 –				

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14.	3.64	What are 'exceptional circumstances'?	3.183. It seems to be necessary to give further information on the type of 'exceptional circumstances' that are envisaged. A further option could be to remove 'exceptional circumstances' and just emphasise the need for justification.				
15.	3.85 & 3.105(c)	Should transfer of records be a regulatory requirement, rather than an obligation on employers etc?	Privacy Legislation makes such cooperation difficult to achieve unless it is a regulatory requirement				
16.	3.89 (a) & (e)	Suggest delete (a)	Para (a) allows delineation by physical or other suitable means, which is inconsistent with (e) which requires access to be restricted by admin. procedures AND physical barriers. So delineation does not require barriers but restricting access does. Given (e), para. (a) appears to be unnecessary. If (a) and (e) are to remain in modified form they should follow each other on the list.				

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17.	3.123	Separate into (a), (b) & (c) format	Sentence too long and difficult to understand				
18.	3.131	<p>...(a) Determine the characteristics and activity of the material to be discharged, and, for activities or activity concentrations exceeding exemption levels, the potential points and methods of discharge;</p> <p>(b) Determine, for activities or activity concentrations exceeding exemption levels, by an appropriate pre-operational study all significant exposure pathways by which discharged radionuclides can deliver public exposure;</p> <p>(c) Assess, for activities or activity concentrations exceeding exemption levels, the doses to the representative person due to the planned discharges;.....</p>	Activities or concentrations that could be exempted from regulations should a priori be acceptable for discharge, so the addition of phrase ", for activities or activity concentrations exceeding exemption values," is proposed.				
19.	3.163	Delete "while the activity in the rest of the body is kept as	Once administration of the prescribed activity of the				

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20.	Req. 49 & 5.10 – 5.18	low as reasonably achievable.” This is confusing, as it is not consistent with the definition of existing exposure used earlier.	chemical/physical form of the radionuclides has occurred the <i>in vivo</i> distribution of the radionuclide is, in most cases, outside the control of the radiological medical practitioner, medical physicist, medical radiation technologist, or radiopharmacist. Whilst localisation primarily in the organ(s) of interest, and low activity in the rest of the body are the desiderata, these two factors are functions of the chemical/physical nature of the radiopharmaceutical and in many cases will not be able to be manipulated separately If a member of the public receives an additional exposure as a result of a planned remedial activity, should this not be considered as a planned exposure, or subject to the same controls as would be considered for a planned exposure, as is required for workers (paragraph 5.26)?				

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21.	5.12(c)	Need to add a requirement to this section to say who is responsible if the original organization no longer exists or cannot be identified.	It is not always possible to determine who is responsible, as the relevant organisations may no longer exist.				
22.	Sched. I-1.	In I-1(a) delete the phrase "and the exempted practice or source is inherently safe".	The concept of 'inherently safe' is more clearly captured in the existing phrase 'with no appreciable likelihood of scenarios that could lead to a failure to meet this criterion'. The inclusion of the deleted phrase may confuse as it is not clear what 'inherently safe' means.				
23.	Sched. I-4	I-4. radionuclides of natural origin, other than when incorporated into consumer products, or used either as a radioactive source or for their properties as chemical elements, shall be exempted be if: (a) The activity concentration of each radionuclide in the uranium and thorium decay does not exceed 1 Bq/g and the activity concentration of ⁴⁰ K	The current I-4 means that there would have to be a case-by-case assessment for exemption of every natural material, even the trivial. It also means there is an inconsistency with the clearance requirements. For example a material may not be exempt under I-4, but could still be cleared under I-9(b). It is proposed to re-word to make it more consistent with the criterion from paragraph I-9(b) for clearance in a new point				

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		does not exceed 10 Bq/g[45]; and (b) An assessment of the doses to individuals, if required by the regulatory body, demonstrates that doses as a consequence of these activity concentrations are commensurate with natural background levels, or unlikely to exceed 1 mSv in a year.	(a) and some re-wording of I-4 in a new point (b) to give the regulatory body power to require an assessment but not to require it in cases where doses are clearly trivial. Also remove 'about' in last phrase, similar to I-8.				
24.	I-6	In (a) change 'equipment' to 'apparatus'	For consistency with the rest of the para.				
25.	I-9(b)	Include a table to present the 1 Bq/g and 10 Bq/g (⁴⁰ K) levels for natural materials.	It would be helpful if this information could also be provided in a table, as occurs in various guidance documents, e.g. RS-G-1.7.				
26.	I-10	Change 'granted to subject' to 'granted subject'	Typographical error				
27.	Table III-1	Delete this Table	The dose coefficients are to be changed within the next 2 years by ICRP, and they are not needed to				

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28.	III-8	Delete	implement the BSS. Other dose conversion factors have been removed on the basis that this is a requirements document and dose conversion factors will be republished in a safety guide. As Table III-1 is proposed to be deleted				
29.	Glossary	Amend last para of optimization definition to read 'For medical exposures of patients, optimization of protection and safety is the management of the radiation dose to the patient taking into account that the primary purpose of a medical exposure is to achieve an effective diagnosis or treatment.'	The definition of optimization does not make sufficient distinction between the meaning in the context of protection and safety and optimization in the medical context (where there is a clear benefit to the patient being exposed), i.e. 'commensurate with the medical purpose' is too vague.				