



Australian Government

Australian Radiation Protection and Nuclear Safety Agency

RESPONSE BY THE CEO OF ARPANSA TO THE RADIATION HEALTH AND SAFETY ADVISORY COUNCIL (RH&SAC) RECOMMENDATIONS ON NORM

The safe management of materials containing naturally occurring radioactive material (NORM) is of great importance to Australia given the significance of industries that need to deal with NORM to the Australian economy.

I agree with position adopted by the RH&SAC that:

it is timely to address management of NORM and for Australia to move ahead in a structured way to achieve nationally uniform outcomes.

The data gathered in the course of the work conducted by the RH&SAC shows that there are potentially issues to be addressed to demonstrate to the community that NORM is and will continue to be safely managed. At the same time, the radiation protection framework, both internationally and in Australia, is developing the thinking and tools needed to tackle the issues of safe – and cost-effective – management of NORM.

The alternative is to continue to address specific issues as they arise in an ad hoc fashion. This runs the risk of being discredited in the eyes of the community – and national and international stakeholders - if there is not seen to be a systematic and consistent approach. And as many industries that deal with NORM are export oriented, Australia needs to be able to demonstrate to customers and shippers that the issues are being addressed here in a way consistent with international best practice.

In other words, Australia needs to be on the front foot on this issue – both following international best practice, but also leading in its development.

As recommended by RH&SAC, ARPANSA will work to

develop national guidance on NORM management, including uniform exclusion and exemption provisions, treatment and disposal of NORM arising from various waste process streams and remediation of contaminated sites.

In doing this work, ARPANSA will observe the following principles:

- The guidance will be developed in consultation with industry and other relevant stakeholders and in consultation with the States/Territories through the Radiation Health Committee
- Where application of the guidance requires requirements for adoption through the National Directory for Radiation Protection, the full consultation and agreement process agreed for matters to be included in the NDRP will be followed. This includes preparation of and consultation on a regulatory impact statement.
- The guidance will take account of international guidance, especially that in the IAEA Safety Guide *Application of the Concepts of Exclusion, Exemption and Clearance* (RS-G-1.7) and the forthcoming Safety Guide *Safe Management of Wastes Containing NORM* (DS 352), together with exclusion and exemption provisions of the NDRP
- Assessment of the need for guidance or regulation in any industry category or specific industry example will be based upon collection of real-life data and a thorough assessment of risk (potential doses of radiation to workers and public). The degree of

any regulation must be commensurate with the assessed risk and designed to bring that to an acceptable level.

ARPANSA will form a stakeholder consultative group to help it guide this project.

With regard to the RH&SAC recommendation:

That ARPANSA develop a strategy to raise public awareness of NORM, and awareness of NORM management in relevant industries

ARPANSA plans in the first instance to develop a 'NORM website'. The website initially shall draw on the work and data that the Council has developed to date and include links to other material relevant to NORM management, including international guidance. Over time, the NORM website should be a useful tool for both industry and the interested public to gain knowledge about NORM and its management in Australia.

The website shall be developed in consultation with the stakeholder consultative group and drawing on State/Territory expertise.

John Loy
CEO of ARPANSA
21 October 2005