



**REGULATORY GUIDE: Managing the Source Inventory**

It is a condition of ARPANSA source licences that the licence holder maintains an up-to-date, accurate source inventory. Some facility licences may also require maintenance of an inventory of associated sources. The source inventory is maintained in the form of a Source Inventory Workbook (SIW). In addition to any prior approval or submission requirements, the licence holder must advise the CEO of any changes to the source inventory in the next quarterly report. (See Regulatory Guide: Reporting compliance)

**Managing the SIW workbook**

Guidance on how to maintain and update the workbook is provided in the first worksheet of the SIW. Some important points to note with regard to completing the workbook are as follows:

- Where dropdown lists are provided you must use them. If the item you are licensed to deal with does not match any of the categories listed you should select ‘other’ and then describe the item in the next column.
- It is recommended that a source identification number stays with the source until it is permanently removed from the SIW. If you have to renumber a source e.g. it changes from one worksheet and/or hazard group to another then you must advise of the old number in the comments column. This allows cross-matching between old and new versions of the SIW.
- It is important to provide precise location details down to room level, especially for sealed and unsealed sources. This enables correct aggregation when considering the security categorisation and calculation of annual licence charges.
- Note that when sources are added or removed from the SIW, details of these transactions must be provided in the appropriate sections of the next quarterly report. A copy of the amended SIW should form part of that report.
- When a plan is made to dispose of a source you will need to gain prior approval from ARPANSA (see Regulatory Guide: Disposal of controlled apparatus and controlled material). Do not remove the source from the SIW until approval has been granted and you have actually disposed of the source.

**Managing the regulatory implications of changes to the SIW**

Any variation to the source inventory will require the licence holder to consider what regulatory action is required. The licence holder must consider whether a new licence application is required (because the proposed dealing is different to that authorised by the licence) or whether regulation 51, 52 or 53 apply. Licence holders intending to acquire,

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relocate, transfer, dispose of, or modify a source or facility should refer to regulations 51, 52 and 53. Where there is any doubt ARPANSA should be consulted.

Regulation 51 requires the licence holder to seek prior approval from the CEO for a relevant change that has significant implications for safety. A relevant change is defined in regulation 3 as ‘a change to the details in the application for licence; or a modification of the source or facility mentioned in the licence’.

Regulation 52 requires the licence holder to tell the CEO about other relevant changes, not likely to have significant implications for safety, on a quarterly basis.

If the variation to the source inventory is transfer or disposal of a source, then regulation 53 applies. Disposal requires the prior approval of the CEO; transfers must be reported within 7 days.

The required action will depend on the particular circumstances and may also require an amendment to the plans and arrangements. Some scenarios where a licence holder is planning to vary the source inventory are described below. Examples for each of these scenarios can be found at the end of this guideline.

Bear in mind that the requirements of relevant codes and standards must also be taken into account when considering the implications of proposed inventory changes. For example RPS 11 *Code of practice for security of radioactive sources* applies when security enhanced sealed sources are involved.

### **Scenario 1: A licence holder wants to acquire additional controlled apparatus or controlled material for a dealing that is authorised under the licence**

In this situation a new licence application is not required and the existing licence does not need to be amended. This is because the licence holder’s plans and arrangements for managing that type of source has already been assessed and found to be satisfactory. The change is regarded as a ‘relevant change’; however, it is unlikely to have significant implications for safety and therefore regulation 52 applies.

**See examples 1 & 2**

### **Scenario 2: A licence holder wants to relocate an item of controlled apparatus or controlled material from the location specified in the source inventory**

This is a proposed change to details provided in the licence application (or subsequently approved) and therefore a relevant change. The licence holder must consider whether regulation 51 or 52 applies, that is, whether the relocation is likely to have significant implications for safety. Prior to moving a source, the licence holder must consider such things as shielding, storage, security, transport, etc. If there are significant implications for safety in the process of relocation or at the new location, then the licence holder must seek approval of the CEO under regulation 51 before the source is moved. If there are unlikely to be any significant implications for safety, prior approval is not required but relocation of the source must be reported under regulation 52 in the next quarterly report.

**See examples 3 & 4**

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### **Scenario 3: A licence holder wants to use a controlled apparatus or controlled material listed in their source inventory for a different purpose not authorised under the licence**

In most cases, a new licence application will be required. If the proposed dealing is similar to another authorised dealing, then regulation 51 could apply. The licence holder may need to seek advice from ARPANSA.

**See example 5**

### **Scenario 4: A licence holder wishes to deal with a source that belongs to another organisation**

There are certain situations where a licence holder may wish to use a source owned by another organisation. For example, a source may be leased, hired or borrowed, or a controlled person may be required to use another organisation's source at that organisation's premises.

Under the ARPANS Act, dealing includes possession or having control of. Therefore use of a source belonging to another organisation may only be undertaken if authorised by a source licence. In such circumstances the licence holder must consider whether the existing authorisation covers the proposed activity or whether an amendment to the licence or further licence application is required.

**See examples 6 & 7 & 8**

### **Discovery of sources not on the source inventory**

There have been occasions where licence holders have discovered additional sources that are not included on their original or updated inventories. These have mostly been non-ionising apparatus such as Class 3B lasers and UV sources as well as 'legacy' radioactive sources.

Discovery of a new kind of source not covered by the licence may require a new licence application. Advice should be sought from ARPANSA if there is doubt about the status of any newly identified source in relation to the licence.

### **Removal of items no longer considered controlled sources from the source inventory**

Where an item is identified as no longer meeting the definition of a controlled apparatus or material it should be removed from the SIW and details reported in the next quarterly report. The reason for the removal must be clearly described e.g. failsafe interlocks installed on Bio-safety cabinet so that excess levels of UV radiation are no longer accessible as per regulation 4(2) (c) OR source has decayed below exemption level.

### **Licence holders with multiple divisions and/or multiple sites**

Some licence holders have a number of divisions at one location or spread over multiple sites. Each division may have a separate source licence. The licence holder may also have facility licences (usually one for each prescribed radiation facility).

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If a licence holder wants to relocate a source from one division to another, from one site to another, or even from one licence to another, the licence holder must determine whether a new licence application is required or whether regulation 51 or 52 applies.

a) *Relocation of a source within the same division at the same site:*

Regulation 52 applies; the licence holder must report the changes to the source inventory in the next quarterly report.

b) *Relocation of a source within the same division, but at a different site:*

Regulation 52 applies if similar dealings are undertaken at the new site, otherwise regulation 51 applies.

c) *Relocation of a source to a different division at the same site:*

Regulation 52 applies if the division receiving the source is authorised for the dealing, otherwise regulation 51 applies. Note that regulation 53(2) also applies here as the transfer of a source from one licence to another must be reported to ARPANSA within 7 days.

d) *Relocation of a source to a different division at a different site:*

Same as c.

e) *Transfer of a source from a facility licence to a source licence:*

A new licence application is required unless the dealing is authorised by an existing source licence. If authorised, then regulation 52 applies. (Also regulation 53(2) applies as above.)

f) *Transfer of a source from a source licence to a facility licence:*

If the dealing is authorised by the facility licence, then regulation 52 applies. If not, then regulation 51 applies and prior approval must be sought. (Also regulation 53(2) applies as above.)

If a licence holder wants to undertake a new dealing in a particular division the licence holder must determine whether regulation 51 applies or whether a new application is required. If the new dealing is not authorised by any existing source licence(s) held by that organisation, either because it involves a different kind of source or because it involves a new and different use of a source, then a new licence application is required. If the new dealing is authorised by an existing source licence held by that organisation, then regulation 51 applies.

## Examples

### Example 1

A licence authorises dealing with a sealed source in a fully enclosed analytical device (Item 2, Group 1) more specifically, devices containing Ni-63 with activities up to 555 MBq. The licence holder wants to use similar activities of a different source (C-14) in another device of the same type.

In this situation a new licence application is not required. The change is regarded as a 'relevant change'; however, it is unlikely to have significant implications for safety and is therefore covered by regulation 52. The licence holder must advise the CEO of the change to the source inventory in the next quarterly report. A copy of the amended SIW should part of the report.

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### **Example 2**

A licence holder is authorised to deal with a partially enclosed x-ray analysis unit. If the licence holder wants to acquire another partially enclosed x-ray analysis unit, a new licence application is not required and no amendment to the existing licence is necessary. Regulation 52 generally applies; the source inventory must be updated and the acquisition of controlled apparatus reported in the licence holder's next quarterly report as per Example 1. Regulation 51 could apply in some situations - see example 3.

### **Example 3**

A fixed industrial x-ray unit is located in Building A. If the licence holder wants to relocate the apparatus to Building B, this may have a significant effect on safety in terms of protective shielding, interlocks, warning lights, etc. Such a change would require the prior approval of the CEO under regulation 51.

### **Example 4**

An unsealed source is listed in the source inventory as used in Laboratory C. If the licence holder relocates this source to Laboratory D with the same policies and procedures and with similar storage and handling facilities, then the change is unlikely to have significant implications for safety. Such a change would fall under regulation 52 with no prior approval required.

### **Example 5**

A licence authorises the use of a sealed source in a partially enclosed analytical device. If the licence holder wants to use the same source in a mobile gauge, then the different hazards and operational aspects must be considered. If the licence does not authorise this particular dealing then a new licence application will be required.

### **Example 6**

Licence holder Y wishes to lend a sealed source of 100 MBq Cf-252 to licence holder Z for a particular project.

Licence holder Z must be authorised for the proposed dealing. The transfer of possession is covered by regulation 53(2) and must be reported to the CEO within seven days. In this case, the source inventory of licence holder Y must be amended to either delete the source or indicate that the source is temporarily on loan. The source inventory of licence holder Z must be amended to include the source until it is returned. Such changes to the source inventories would then be reported in accordance with regulation 52. Similarly, the respective licence holders must report when the source is returned and make the appropriate changes to their source inventories.

### **Example 7**

A source licence authorises the licence holder to deal with baggage x-ray apparatus. The licence holder leases additional baggage x-ray apparatus from an organisation outside the Commonwealth.

In their next quarterly report, the licence holder must report the additions to the source inventory. Eventual return of the source to an organisation outside the Commonwealth's jurisdiction will constitute a disposal under regulation 53(1).

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**Example 8**

A source licence authorises dealings with a fully enclosed analytical x-ray unit. In a collaborative venture with a University, it is proposed that a controlled person covered under the source licence will use a fully enclosed analytical x-ray unit owned by the University at the University's premises.

This dealing is authorised under the source licence. The licence holder must update the source inventory to include the details of the University's source. The CEO should be advised of the change in accordance with regulation 52. The conditions attached to the licence with respect to this kind of controlled apparatus are still applicable. Where direct compliance with these conditions is outside the control of the licence holder (as in the case of equipment maintenance) it is the responsibility of the licence holder to be satisfied that the conditions have been met and to provide supporting evidence to ARPANSA if required. For example, the licence holder may be required to provide ARPANSA with the licensing or registration information from the relevant State/Territory regulatory authority.

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