



REGULATORY GUIDE: Reporting Compliance

Regulation 63(1)(b) requires the CEO to publish guidelines on how licence holders will report their compliance with the Australian Radiation Protection and Nuclear Safety Act 1998, the regulations and licence conditions. This document provides information on when, how and what licence holders must report.

When to report

Licence holders must provide a quarterly report to the CEO of ARPANSA in an approved form, within 28 days of the end of each quarter, that is, by 28th of January, April, July and October.

An electronic reminder is sent to all licence holders two weeks prior to the end of each quarter.

How to report

Licence holders should use the [Reporting Proforma](#) approved by the CEO for this purpose.

Reports may be submitted electronically by the licence holder's Radiation Safety Officer, or other persons authorised to provide such information on behalf of the licence holder. Reports should be sent to licenceadmin@arpansa.gov.au with a copy to the licence holder/nominee. An electronic acknowledgement will be sent by ARPANSA confirming receipt of the report.

What to report

The licence holder should address all matters in the reporting form. See below:

1. Accidents (Regulation 46)

The licence holder must tell the CEO about an accident within 24 hours and give the CEO a written report about the accident within 14 days.

Guidance on what constitutes an accident for the purposes of regulation 46 is provided in [Regulatory Guide: Reporting an Accident](#). The quarterly report should include a summary of any accidents reported during the quarter.

2. Other abnormal events

Any other abnormal event that has the potential to affect safety should be reported on a quarterly basis except as otherwise required by a licence condition.

3. Dose limits (Regulations 57 – 62)

Division 5.2 of the regulations sets out the practices to be followed by licence holders with respect to dose limits. Any dose received by an individual that exceeds the dose limit must be regarded as an accident and reported under regulation 46. Any other unusually high doses that required investigation or corrective action should be reported in the quarterly report.

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4. Acquisition of sources

Before acquiring additional sources the licence holder should consider which of the following regulatory actions is required:

- o A new licence application
- o Prior approval under regulation 51
- o Reporting a change to the source inventory under regulation 52

For further guidance see [Regulatory Guide: Managing Changes to the Source Inventory](#)

A summary of sources acquired during the quarter should be included in the quarterly report.

5. Disposal of sources (Regulation 53(1))

The holder of a licence must tell the CEO about movement of controlled apparatus, controlled materials and controlled facilities.

Disposal is regarded as destruction of a source or removal of a source from the control of the Commonwealth to another jurisdiction. Disposal of sources can only occur with the **prior approval** of the CEO.

Licence holders seeking approval from the CEO for the disposal of a source should use the [Disposal Request Proforma](#). Completed forms should be submitted via email to licenceadmin@arpansa.gov.au.

A summary of any disposals made during the quarter should be included in the quarterly report.

6. Transfer of sources (Regulation 53(2))

Transfer of sources to the control of another ARPANS licence holder must be reported to the CEO **within 7 days**. Transfer provisions apply also to infrequent sales, hires, loans, gifts, or donations within Commonwealth jurisdiction.

Licence holders should notify the CEO about a source transfer using the [Transfer Notice](#). Completed forms should be submitted to licenceadmin@arpansa.gov.au.

Additional or alternative reporting requirements may be imposed under sub-regulation 53(4) where regular sales of controlled material or controlled apparatus are authorised under a source or facility licence. Compliance with any alternative reporting arrangements will be specified in the licence.

For further guidance on source transfer see Regulatory Guide: Managing Changes to the Source Inventory.

A summary of any transfers made during the quarter should be included in the quarterly report.

7. Corrective action arising from an inspection

Progress on any corrective actions arising as a result of a regulatory inspection should be reported.

8. Relevant change with significant implications for safety (Regulation 51)

The licence holder must seek prior approval from the CEO of ARPANSA to make a '*relevant change that will have significant implications for safety*'.

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A 'relevant change' is defined in the ARPANS regulations as:

- any change to details provided in the licence application or
- modification of a source or facility

Examples of matters falling under regulation 51 are:

- Certain changes to the source inventory (see Regulatory Guide: Managing Changes to the Source Inventory)
- Changes to the plans and arrangements for managing safety
- Changes to operating procedures that could affect safety
- Changes to operating limits and conditions
- Changes to systems, structures and equipment that are important to safety, including changes to shielding
- Significant changes to the Safety Analysis Report

Not only the change itself must be considered, but also the process of making the change. If a *relevant change* has the potential to significantly increase the risk to operators or the public if it is inadequately conceived or improperly implemented, then the relevant change may have significant implications for safety.

If there is any uncertainty about whether the relevant change would be regarded by ARPANSA to have a significant implication for safety, ARPANSA should be consulted before the change is made.

9. Relevant changes unlikely to have significant implications for safety (Regulation 52)

Licence holders must report any '*relevant change that is unlikely to have significant implications for safety*' on a quarterly basis.

Examples of matters falling under regulation 52:

- Acquisition of an additional source of a kind already authorised by the licence (see Regulatory Guide: Managing Changes to the Source Inventory)
- Certain administrative changes such as a change in nominee (unless otherwise required by a licence condition)

10. Review of plans and arrangements (Regulation 50)

Licence holders are required to review their plans and arrangements for managing safety at least once a year and to tell the CEO about the review. Reporting such information in one of the four quarterly reports each year will satisfy this licence condition. When conducting the review, licence holders should refer to the ARPANSA [Regulatory Guide: Plans and Arrangements](#).

11. Compliance with any special time-related licence conditions

Any special conditions that require the licence holder to take action within a certain time appear in a schedule to the licence. The licence holder should report progress against any such licence conditions. The conditions will be removed when compliance has been demonstrated.

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12. Breaches of licence conditions (Regulation 45)

If the holder of a licence identifies a breach of licence conditions, the licence holder must tell the CEO as soon as reasonably practicable. The quarterly report should include a summary of any breaches reported during the quarter.

Common breaches relate to:

- *Regulation 49:* A licence holder failing to comply with their plans and arrangements for managing safety.
- *Regulation 50:* A licence holder not reviewing and updating plans and arrangements at least once every 12 months and/or not telling the CEO about the review.
- *Regulation 51:* A licence holder not seeking the CEO's prior approval to make a relevant change that will have significant implications for safety.
- *Regulation 53:* A licence holder not seeking prior approval from the CEO or telling the CEO about movement of controlled apparatus, controlled materials and controlled facilities, in particular failure to obtain prior approval before disposing of controlled apparatus or controlled material.

NOTE: Where changes to the source inventory have occurred during the reporting period, a copy of the updated Source Inventory Workbook should be provided with the quarterly report.

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