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Australian Radiation Protection and Nuclear Safety Agency

ARPANSA Licence Holder Forum

ANSTO

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Compliance Issues 2008-2009

Common Non-Compliances

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Compliance Issues 2008-2009

Why does ARPANSA conduct site inspections and review information received from licence holders?

One of the functions of the CEO of ARPANSA is to monitor compliance with Division 1 of Part 5 of the ARPANS Act - The regulation of controlled material, controlled apparatus and controlled facilities



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Monitoring compliance is but one tool to assist the CEO of ARPANSA in meeting the object of the ARPANS Act which is:

...to protect the health and safety of people, and to protect the environment, from the harmful effects of radiation



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An APANSA licence authorises the licence holder, employees of the licence holder, Commonwealth contractors and employees of Commonwealth contractor employees to deal with controlled material or controlled apparatus or to operate a controlled facility

Subject to:

- **Section 35 of the ARPANS Act**
- **Part 4 Division 4 of the ARPANS Regulations**
- **Practices to be followed in Part 5 of the ARPANS Regulations**
- **Conditions in Schedule 2 of the licence**



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What are the main means by which the CEO of ARPANSA gathers information about compliance?

- Information directly supplied by the licence holder
- Information gathered during ARPANSA inspections or investigations



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Common Non-Compliances

Licence Condition 6 - compliance with relevant sections of standards and codes

Signs/labels - The most common non-compliance issue with the licence condition found during inspections relates to either the absence of a warning sign/label or it is of the wrong type.

Although some may regard this as trivial, in fact appropriate warning signs/labels are very important radiation hazard control measures.



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Common Non-Compliances

Incorrect warning sign & label





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Incorrect warning sign & label





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Correct laser warning sign & label





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Correct warning label

The requirements for radiation warning signs and labels are specified in relevant codes and standards.

Please refer to Schedule 2 of your licence for the codes and standards that apply to the controlled apparatus or controlled material specified in Schedule 1 of your licence





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Common Non-Compliances

Stores for radioactive material – The second most common non-compliance issue with the licence condition found during inspections relates to the storage of radioactive material other than as prescribed in the relevant standard or code.

Of note here is the storage of liquids containing radioactive material, the storage of radium, thorium or uranium giving rise to radon emanation, and labelling.



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Common Non-Compliances





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Non-compliance issue - storing radioactive material (cont.)

- Spillage trays for containers of liquid radioactive material must be provided and be of sufficient volume to retain the whole of the contents of the containers
- An air extraction system must be provided if any radioactive gases or vapours are emitted from the radioactive material



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Compliance Issues 2008-2009

Common Non-Compliances

Non-compliance issue - storing radioactive material (cont.)

- All containers of radioactive material shall be labeled as follows:

RADIOACTIVE SUBSTANCE

Department / laboratory _____

Radionuclides _____

Activity _____

Description of contents _____

Date _____ *Signature* _____ *Name* _____



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Common Non-Compliances

In general, the standard applied to the storage of radioactive material is:

AS 2243.4 Safety in laboratories part4: Ionizing radiations

However, if your controlled material is contained in a device, the code or standard specifically referred to in Schedule 2 of the licence may provide more specific requirements on how the device containing the radioactive material must be stored.

CHECK SCHEDULE 2 OF YOUR LICENCE



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Common Non-Compliances

Licence Condition 1 – The licence holder must maintain an up to date and accurate inventory of all controlled apparatus and controlled material in a form acceptable to the CEO of ARPANSA

A common non-compliance issue amongst licence holders is the maintenance of the Source Inventory Workbook (SIW).

What is clear is that the more items on the inventory and the more locations at which items are kept the greater the challenge to those responsible for maintaining the SIW.



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Compliance Issues 2008-2009

Common Non-Compliances

Licence Condition 1 (cont.)

The downloadable SIW Excel spreadsheet on the APANSA website contains instructions on how to complete the SIW and also contains management tips.

However, an up to date and accurate SIW is dependent upon the implementation of practical procedures so that changes are communicated to the person responsible for maintaining the SIW.



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Common Non-Compliances

Licence Condition 2 – The licence holder must provide information about compliance within 28 days of the end of each quarter

Non-compliance with licence condition 2 accounted for approximately 20% of the breaches reported to Parliament

All due to late submission



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Common Non-Compliances

Licence Condition 2 (cont.)

ARPANSA Regulatory and Policy Branch – Licence Administration sends a reminder email to appropriate licence holder contacts 2 weeks prior to the end of the quarter

In response to the number of breaches - In addition to the above email, we will soon be sending a 2nd reminder email 2 weeks prior to the 'due by' date



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Common Non-Compliances

Regulation 53(1) – CEO approval is required prior to destroying/disposing of a controlled apparatus or controlled material

Disposal includes the transfer of controlled apparatus or controlled material to a person or organisation outside Commonwealth jurisdiction.

Non –compliance with Reg53(1) accounted for approximately 25% of the breaches reported to Parliament.



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Common Non-Compliances

Regulation 53(1) cont.

Non-compliance with Reg53(1) is a similar issue to that of licence condition 1 – Maintaining the SIW. Again, the more items on the inventory and the more locations at which items are kept the greater the challenge to those responsible for submitting request forms to ARPANSA.

Compliance with Reg53(1) is in part dependent upon the implementation of practical measure or procedures so that the responsible person is made aware (well in advance) of any plans to dispose or destroy a controlled item.



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Common Non-Compliances

Questions?