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**Australian Radiation Protection and Nuclear Safety Agency**

# **ARPANSA Licence Holder Forum**

## **AFP College, Canberra**

### **17 September 2010**

**Compliance Issues 2009-2010**  
**Common Non-Compliances**

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## Compliance Issues 2009-2010

*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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## Compliance Issues 2009-2010

Monitoring compliance is one way 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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## Compliance Issues 2009-2010

Some 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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## Compliance Issues 2009-2010

### 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 25% of the breaches reported to Parliament ...*Due to late submission*

*HOWEVER...*



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# Compliance Issues 2009-2010

## Common Non-Compliances

### Licence Condition 2 (cont.)

In response to the high percentage of these breaches in 2008-2009, ARPANSA implemented a 2<sup>nd</sup> reminder email 2 weeks prior to the 'due by' date.

*Resulted in a turn-around in compliance...*

*100% on-time in the 3<sup>rd</sup> quarter 2010*

*95% on-time in the 4<sup>th</sup> quarter 2010*



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# Compliance Issues 2009-2010

## Common Non-Compliances

### Unlicensed source dealings - s31(1) the Act

15% of breaches concerned unlicensed 'dealing with' controlled apparatus or controlled material .

*'Deal with' – possession, control, use, operate or disposal*

*Ensure that the licence authorises the dealing before acquiring the controlled apparatus or controlled material.*

*If in doubt whether or not the item is controlled – contact your ARPANSA regulatory officer*



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# Compliance Issues 2009-2010

## 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**

Failing to maintain a Source Inventory Workbook (SIW) accounted for 12.5 % of breaches.

*It appears 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 2009-2010

## Common Non-Compliances

### Licence Condition 1 (cont.)

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

*An up to date and accurate SIW is dependent upon the implementation of practical procedures to ensure changes to inventory are communicated to the person responsible for maintaining the SIW.*



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# Compliance Issues 2009-2010

## Common Non-Compliances

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

Accounted for 12.5% of breaches

**Signs/labels** – A common non-compliance issue with the licence condition - either the absence of a warning sign/label or it is of the wrong type.

*Appropriate warning signs/labels are a very important radiation hazard control measures.*



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# Compliance Issues 2009-2010

## Common Non-Compliances

Incorrect



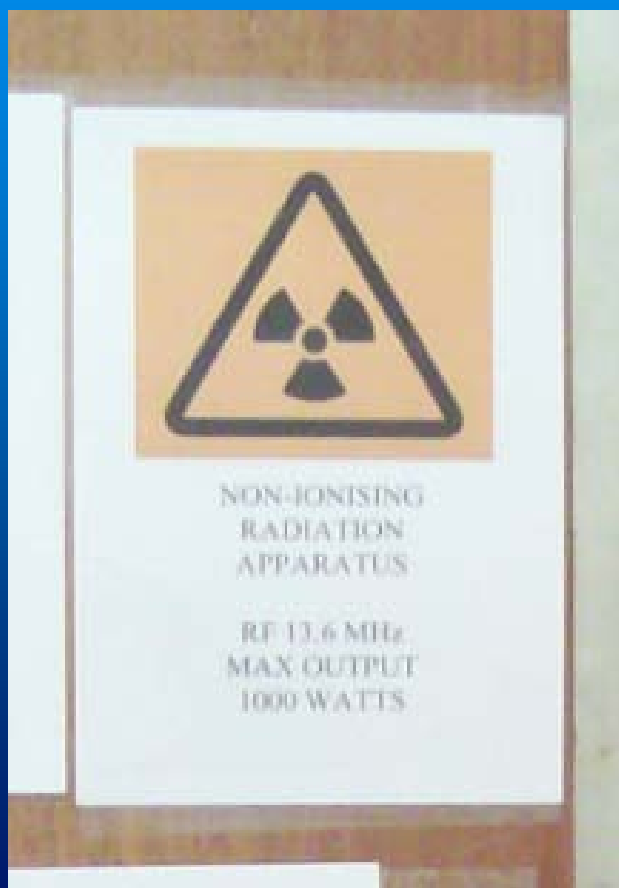


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# **Compliance Issues 2009-2010**

## **Common Non-Compliances**



Incorrect





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# Compliance Issues 2009-2010

## Common Non-Compliances

Correct







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# **Compliance Issues 2009-2010**

## **Common Non-Compliances**

### **Correct**

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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# Compliance Issues 2009-2010

## Common Non-Compliances

### Non-compliance issue: signs and labels (cont.)

AS 2243.4 Safety in laboratories part 4: Ionizing radiations

All containers of stored radioactive material shall be labelled as follows:

*RADIOACTIVE SUBSTANCE*

*Department / laboratory*\_\_\_\_\_

*Radionuclides*\_\_\_\_\_

*Activity*\_\_\_\_\_

*Description of contents*\_\_\_\_\_

*Date*\_\_\_\_\_ *Signature* \_\_\_\_\_ *Name*\_\_\_\_\_



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# **Compliance Issues 2009-2010**

## **Common Non-Compliances**







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# Compliance Issues 2009-2010

## Common Non-Compliances



### Calibration of radiation monitoring instruments

Not maintaining the proper calibration frequency for radiation monitoring is an emerging non-compliance issue.

Instruments used to measure radiation dose, dose rate or activity. **To be calibrated at least annually.**

Instruments used to detect the presence or absence of radioactive contamination..non-quantitative info.  
**To be calibrated at least every 5 years.**

- AS2243.4 (clause 9.2)
- ARPANSA Regulatory Guide: Frequency of Calibration of Radiation Monitoring Instruments (July 2010)



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# Compliance Issues 2009-2010

## 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.*



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# Compliance Issues 2009-2010

## Common Non-Compliances

### Regulation 53(1) cont.

In the year 2008-2009 non-compliance with Reg 53(1) accounted for approximately 25% of breaches

*However there has been a significant improvement:*

*In 2009-2010 non-compliance with Reg 53(1) fell to 7.5% of breaches*



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Questions?