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ARPANSA Licence Holder Forum
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ARPANSA Inspection Program Outcomes
2007 – 2008

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ARPANSA Inspection Program 2007-2008

- In the period Nov 07 – May 08 ARPANSA inspectors undertook 38 inspections (excluding ANSTO facilities and sources)
- The inspection program was informed by a risk assessment methodology utilising a 3 x 3 risk ranking matrix of control and hazard



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ARPANSA Inspection Program 2007-2008

Risk-ranking matrix

HAZARD

CONTROL	1	2	3
Good	1	2	3
Satisfactory	2	4	6
Poor	3	6	9



Low risk



Medium risk



High risk

Note: Default control = 2



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ARPANSA Inspection Program 2007-2008

- The program focussed on sites identified as high risk (i.e. score of 6 or 9)
- The decision to undertake an inspection also took into consideration several other factors e.g. geographical location, date of last inspection, compliance history, concurrent inspections happening in the same area



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Outcomes

Inspections highlighted some common areas of non-compliance:

- Management of Source Inventory (SIW)
- Quarterly reports
- Training
- Review of plans and arrangements
- Conformance with Codes and Standards
- Use of sources beyond manufacturer's RWL





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Management of SIW

Licence condition 1 states that licence holders must maintain an up to date source inventory

- Sources not found in location listed
- Incorrect categorisation of items
- Incomplete details of source e.g. serial numbers missing
- Persons accountable for sources unsure of responsibilities
- Items disposed without approval under Regulation 53

It is the licence holders responsibility to ensure the SIW is accurate and up to date at all times



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Compliance Reporting

Licence condition 2 states that the licence holder must submit a quarterly report within 28 days of the end of the quarter

- Wide variety in how the information is collected from across the licence holders sites
- Issues which should be reported under Regulation 52 are missed
- Reports often late

Person responsible for collating information for quarterly reports needs to keep track of issues and ensure sent in on time



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Training

Licence conditions 3 and 4 state that persons who deal with and service/repair controlled apparatus and controlled materials must have appropriate training

- Incomplete training records
- Licence holders assume external contractors provide trained personnel

Licence holders need to ensure appropriate policies and procedures in place to maintain training requirements



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Review of Plans and Arrangements

Licence condition 5 requires that appropriate work practices are documented, maintained, approved and followed

- Plans and arrangements not reviewed annually and reported as per Regulation 50
- SOPs not approved and signed off by RSO
- SOPs not available in the work place
- Documented work practices not followed

Ensure appropriate policies and procedures in place to keep track of work practices including review and reporting



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Codes and Standards

Licence condition 6 requires compliance with relevant Codes and Standards

- Apparatus not labelled with warning signs or signs not posted close to controlled apparatus or controlled material e.g. laboratory bench
- Warning signs do not meet the requirements of the relevant Code e.g. magenta trefoils, incorrect symbols, red and white rather than black and yellow hazard signs
- Sealed sources in use past the source manufacturer's recommended working life

Licence holders must be aware of which Codes and Standards apply to their sources and ensure they meet the requirements of each



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Things you can do to help compliance

- **Do an audit of your SIW and update if required**
 - Include management of sources in training
 - Consider developing an in-house labelling system
- **Review how you collect data for quarterly reports and ensure it gets in on time**
- **Check records of training**
 - Ensure contracts for service/repair require appropriately trained personnel
 - Would personnel benefit from refresher training?



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Things you can do to help compliance

- **Revisit the Codes and Standards applicable to your sources and check conformance**
- **Ensure plans and arrangements are reviewed annually and provide a report to ARPANSA**
 - Check that policies and procedures are appropriately approved, documented and updated as required
- **In particular do audits of the following**
 - Warning labels on all non-ionising apparatus and signage for labs and stores
- **Contact your designated ARPANSA Regulatory Officer**



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Questions?

