

**From:** [BERGHOFER, Paula](#)  
**To:** S 47F -  
**Subject:** Potential Breach of Regulation 53 - Building 76 [SEC=UNCLASSIFIED]  
**Date:** Thursday, 25 May 2017 10:30:40 AM

Good Morning S

Tried to give you a call late yesterday to discuss an event notification that I've logged in the ANSTO System.

During the B76 refurbishment it appears that the UV sterilisation hood LAD Number 5397 has been dismantled and disposed of. It was dismantled in order to remove it from the lab and, according to the refurbishment project team the pieces would have subsequently sent to landfill.

I'll pass on the results of the event investigation, however I'm already planning to get some stickers made for controlled apparatus so that it is clearer that they are under regulatory control and cannot be disposed without ARPANSA permission.

Let me know if you would like any more information at this stage, I'm happy to discuss.

Kind Regards,  
Paula

**From:** [grc8support@ansto.gov.au](mailto:grc8support@ansto.gov.au) [mailto:[grc8support@ansto.gov.au](mailto:grc8support@ansto.gov.au)]  
**Sent:** Wednesday, 24 May 2017 5:04 PM

#### **Triage - Radiological Event**

A Radiological Event has been logged. If you are the RPA triage officer, please triage this event.

#### **Safety Event Type**

Radiological

#### **Date of the Event or Incident**

18/05/2017

#### **Details Description of Event**

On 18 May I received an email requesting to remove controlled apparatus NA005262 from the ANSTO Radioactive Source Register (ARSR) as the unit has been dismantled. The apparatus is a UV sterilisation hood that according to the record is stored in B76 room 022 and was not in use. It is held under the ANSTO Source Licence S0045.

#### **Describe action/s taken immediately as a result of the Event / Incident**

Further enquiries indicate that the apparatus was dismantled and removed from the building as part of refurbishment activities in Building 76. It is believed that it has already been taken to landfill. The apparatus was not on the list of assets in the Building, therefore an Asset Disposal Form was not completed. The Asset Disposal Form contains a sign off from the relevant Licensing Officer to verify that the item is not ARPANSA controlled prior to disposal.

Controlled Apparatus cannot be dismantled or disposed without prior approval from ARPANSA as described under ARPANS Regulations 1999, Regulation 53. This approval was not requested or granted.

A notification to ARPANSA regarding the potential breach of Regulation 53 will be undertaken subsequent to the submission of this event notification.

#### **Other information you think is important for us to assess the event / occurrence**

[No Value Set]

#### **Event or Incident location**

B76

#### **Logged By Division / Institute**

Criteria is Not Applicable

#### **Supervisor**

GRIFFITHS, Hefin

Item	Event	Date of the Event	Detailed	Describe action/s taken immediately as	Other information you think is important	Current
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#	Status	Item Name	or Incident	Description of Event	a result of the Event / Incident	for us to assess the event / occurrence	State
2899	On Track	<a href="#">Submitted by BERGHOFER, Paula - Wednesday May 24, 2017, 4:30 PM</a>	18/05/2017	On 18 May I received an email requesting to remove controlled apparatus NA005262 from the ANSTO Radioactive Source Register (ARSR) as the unit has been dismantled. The apparatus is a UV sterilisation hood that according to the record is stored in B76 room 022 and was not in use. It is held under the ANSTO Source Licence S0045.	Further enquiries indicate that the apparatus was dismantled and removed from the building as part of refurbishment activities in Building 76. It is believed that it has already been taken to landfill. The apparatus was not on the list of assets in the Building, therefore an Asset Disposal Form was not completed. The Asset Disposal Form contains a sign off from the relevant Licensing Officer to verify that the item is not ARPANSA controlled prior to disposal.  Controlled Apparatus cannot be dismantled or disposed without prior approval from ARPANSA as described under ARPANS Regulations 1999, Regulation 53. This approval was not requested or granted.  A notification to ARPANSA regarding the potential breach of Regulation 53 will be undertaken subsequent to the submission of this event notification.		Radiological - Take Triage Assigment

Thank You,  
GRC Cloud Administrator

Released by ARPANSA under the Freedom of Information Act

Unclassified



27 September 2019

s 47F -

A/g Chief Regulatory Officer  
ARPANSA  
PO Box 655  
Miranda NSW 1490

Dear s 47F

**Source Licence S0045 - Potential non-compliance with section 31(a) of the Australian Radiation Protection and Nuclear Safety Act 1998 (the Act).**

ANSTO is reporting a potential non-compliance with s31 (a) of the Act, arising from the installation of a Controlled Apparatus in Building 21B without prior authorisation.

A self-shielded, low-energy 320 kV x-ray unit was received at Lucas Heights on 12 June 2019 and was installed in Building 21B on 14 June 2019.

Following a request from ANSTO on 25 July 2019, ARPANSA advised that the item would be considered a Group 3 Controlled Apparatus, already authorised under Facility Licence F0243, and that no change to the authorisation was needed. However, since that Facility is planned to be decommissioned in the near future, the Responsible Officer began preparing a submission to SAC for ARPANSA approval to add the controlled apparatus that after consideration was categorised as Group 1 Item 26 to ANSTO Source Licence S0045. It was identified at this stage that S0045 does not allow the inclusion of that category of controlled apparatus.

The x-ray unit is intrinsically safe and is currently not in operation. A risk assessment for interlock failure was conducted by SSR, and accidental radiation exposure risks were rated as low or very low. The unit is designed to meet the USA Code of Federal Regulations 1020.40. A detailed radiation survey has been completed post installation. Local arrangements are in place to control use of the new irradiator, including an operation and maintenance procedure. A GRC investigation of the matter is currently underway and subsequently an application will be made to add Group 1 Item 26 controlled apparatus to Source Licence S0045.

If you would like any further information, please do not hesitate to contact Vanessa Sharp, Regulatory Affairs Manager on [vanessa.sharp@ansto.gov.au](mailto:vanessa.sharp@ansto.gov.au) or (02) 9717 3115.

Yours sincerely,

Vanessa Sharp  
Regulatory Affairs Manager