



Radiation Health Committee

Minutes

Date	25 August 2022
Time	9:30 AM - 12:30 PM
Location	Microsoft Teams Meeting
Present	Dr Roslyn Drummond (Chair), Bradley Feldtman (NT), Dr Gillian Hirth (ARPANSA), Fay Bellis, Glenn Riley (VIC), Mark Carey (NSW), Penny Hill (ACT), Hazel Upton (WA) Simon Critchley (QLD), Stephen Newbery (TAS), Joanna Wriedt, Daniel Bellifemine (SA).
Invitees	Sophie Dwyer, Nathan Wahl, Ivan Williams, Kathryn Scully, Fiona Charalambous, Cameron Lawrence, Chennell Allan.
Absent	N/A
Note Taker	James Wheaton

1 - Introduction

The Chair opened the meeting, respectfully acknowledging the Traditional Owners and Custodians of the land on which the meeting was held, paying respects to their Elders, past and present. One potential conflict of interest was declared in relation to Tasmania. The prior minutes (26 May 2022) were noted as finalised.

2 - Member representing the public

No incoming correspondence was tabled. Ongoing concerns around intense-pulsed lights (IPLs) were noted, with ARPANSA further noting the issue was raised with the Commonwealth Department of Health in late 2021. ARPANSA's Advisory Council is also considering the issue alongside further background research that is planned within the agency.

3 - Update from the CEO of ARPANSA

ARPANSA's CEO noted the ongoing significant impact on resources of efforts related to the AUKUS agreement and nuclear-powered submarine taskforce. There is also currently a significant focus, alongside other initiatives underway on national uniformity, on monitoring the progress of actions taken to address recommendations from the 2018 International Atomic Energy Agency (IAEA) Integrated Regulatory Review Service (IRRS) mission, which benchmarked Australia's regulatory

framework against international best practice. ARPANSA expects to engage widely with all State and Territory jurisdictions in the lead up to the 2023 IAEA IRRS follow-up mission, which will assess progress against the 2018 recommendations.

The Nuclear Safety Committee (NSC) continues to look at riser defects in the Australian Nuclear Science and Technology Organisation's (ANSTO) Open-Pool Australian Lightwater (OPAL) reactor, as well as ANSTO's approach to the OPAL reactor's periodic safety and security review (PSSR).

The Radiation Health and Safety Advisory Council (the Council) met online the previous week, with the main topic being advice to the CEO of ARPANSA around nuclear submarine regulation and the Council's views on fundamental principles for any future regulator. It also discussed the International Commission for Radiological Protection (ICRP) review of the system of radiological protection.

The CEO of ARPANSA also described recent media and general public enquiries to the agency, noting that radiofrequency radiation remains the top topic of interest, albeit in the context of a significant drop in the number of public enquiries received overall.

4 - enHealth update

The RHC heard an update from the Environmental Health Standing Committee (enHealth), a standing committee of the Australian Health Protection Principal Committee (AHPPC), following its 27 July 2022 meeting which discussed the project to establish the minimum licensing requirements required to operate, as a benchmark for consistency between jurisdictions. It will be considered further at enHealth's next meeting. The next step is to consult industry and other stakeholders.

It was noted that enHealth's Radiation Health Expert Reference Panel (RHERP) had discussed an issue with the interpretation of the *Code for Radiation Protection in Planned Exposure Situations (2020)* around its application to occupational standards in workplace setting.

It was also noted that national uniformity issues which are not related to nuclear-powered submarines remain important, with the Commonwealth committed to promoting uniform regulatory approaches to underpin community confidence in all radiation regulation.

Clarity around codes and standards and where they are headed is key; having implementable standards is the goal and then RHERP can look at ensuring implementation.

5 - enHealth referral - Dosimetry service provider standard

The issue of a formal accreditation process for personal dosimetry service providers was noted as having previously been referred to enHealth for input, in relation to recommendation 21 and observation six of the 2018 IAEA IRRS findings, and the matter has now been returned to RHC for resolution. An RHC-endorsed standard could be published by ARPANSA and included in the *National Directory for Radiation Protection*. ARPANSA sought comments and feedback from RHC members on the draft accreditation standard tabled.

Task: Accreditation Standard: Dosimetry Service Providers - RHC members to provide feedback @Glenn Riley (DHHS) 25/9/2022

6 - enHealth referral - Advisory Statement: Occupational Compensatory Arrangements

The RHC noted that the issue of compensatory arrangements for workers occupationally exposed to radiation had previously been discussed at enHealth, having been an issue identified in the 2018 IAEA IRRS Mission findings relevant to all Australian jurisdictions.

Following enHealth's request to ARPANSA for RHC to consider the issue in further detail, ARPANSA presented its initial findings from research into the regulatory structures for workers awards and compensation in Australia, broadly finding that Australia's enterprise bargaining framework does provide a system where compensatory arrangements of all kinds (not just for radiation exposure) can be bargained into workplace agreements.

The RHC discussed drafting a statement for the scheduled 2023 IAEA IRRS follow-up mission which details the broader Australian employment relations framework, based on legislation and peak-union policies, and explain the regulatory requirements to manage radiation risks to ensure safety.

The RHC requested that ARPANSA research and consolidate the provisions in union policies and work, health and safety legislation, which demonstrate that compensatory arrangements are not seen as a substitute for optimal protection. This will form the basis for a position statement for the 2023 IRRS.

Task: Compensatory arrangements - draft position to be brought back for RHC @Cameron Lawrence 9/9/2022

7 - Advisory Statement: RPS 10 clarification on dental practitioners

The RHC previously agreed (in October 2021) to develop a statement to clarify the interpretation of 'Dentist' in the *Code of Practice and Safety Guide for Radiation Protection in Dentistry (2005)*, Radiation Protection Series (RPS) No. 10, which does not mention oral health therapists in relation to the operation of dental X-ray equipment.

The RHC considered a draft statement of clarification on the application of RPS 10, in relation to operating dental X-ray equipment, with discussion and concerns raised around differences between jurisdictions relating to which dental practitioners are authorised to operate different types of X-ray equipment.

It was noted that the relevant part of RPS 10, regarding the responsibility of the clinicians operating dental X-ray equipment, relates to the conduct of clinical operation rather than the permission to operate (which each jurisdiction authorises individually).

RHC feedback was sought out-of-session. Dependant on feedback, the document may also be re-circulated to the RHC for endorsement prior to the next meeting.

Task: Advisory statement on RPS 10 - Members to provide comments on statement as drafted. @James Wheaton 9/9/2022

8 - Radon guidance

ARPANSA provided an update on its work with Safe Work Australia (SWA) to develop co-branded guidance to manage the health and safety risks associated with radon in the workplace. It was noted that SWA had not suggested any substantial changes to the draft which ARPANSA provided, with only some sections re-worded and explained better.

RHC members noted the need to consider work, health and safety legislation in each jurisdiction, and avoid unintended overlap or consequences with existing mining-sector regulation. For example, conservative exposure levels may be better referenced as triggers for further considerations, rather than definitive actions. It was suggested that site-specific examples could be used for illustration.

RHC members were asked to provide their comments on the draft guidance out-of-session. It was noted the draft will also be sent to the Radiation Health and Safety Advisory Council for comment.

Task: Radon guidance - RHC members to provide comment on SWA guidance @James Wheaton 16/9/2022

9 - Compliance Testing Standard

The RHC was provided with an update on the working group which is part way through its review of consultation submissions. It was noted that RHC members have a final opportunity to review and provide further comments on the working group's recommendations to address public feedback.

10 - Draft revised RPS 10 - Code for Radiation Protection in Dentistry

A working group update was provided, with a suggestion that the revised Dental Code use similar language to the related Medical Exposure Code (and include information on how it relates to the Planned Exposure Code), which may facilitate the merger of both codes at some point in the future.

It was noted that the initial draft provided by Tasmania was very helpful. Items related to how dental practice is undertaken may not be included in the code but could contribute to a separate safety guide in consultation with the professional dental bodies.

11 - Review of RPS13 and RPS 5 (draft RPSXX Radiation Gauges)

A working group update was given to the RHC, with a request that the working group lead be transferred to another RHC member. The Tasmanian member nominated given their background and experience with the draft to-date.

Decision: Tasmania to lead the Radiation Gauges working group.

12 - Review of well-logging code

The RHC noted that it agreed to develop a well-logging code at its March 2022 meeting, however a working group had not yet been created. RHC members suggested that industry experts could also participate in the working group to contribute their key expertise. The RHC also discussed how to draft this code with guidance without duplicating the Planned Exposure Code.

Western Australia, South Australia and Tasmania agreed to nominate representative or industry experts to the working group, with Tasmania leading the group.

Decision: Nominations to be further organised directly by working group.

Task: Well-logging - Working group established to review the draft code @Drummond, Roslyn, Stephen Newbery 30/9/2022

13 - Guidance for Implementation of Medical Exposure Code

The RHC was provided with an update. It was noted that the working group has not met due to recent pandemic implications. Members noted the existing opportunity to provide comments on the existing guidance drafts for radiation protection in nuclear medicine as well as diagnostic and image-guided radiology. It was requested that final comments are submitted by 9 September 2022.

14 - Review of Workbook for RHS21 RHS22 and RHS9 - New Code Content

A working group update was given to the RHC, with a final request for working group nominations to be provided to the lead jurisdiction Victoria.

15 - Update on review of Security issues (RPS 11)

The RHC was presented with an update on Security issues including a sealed source register and cybersecurity.

16 - Regulatory knowledge exchange

The RHC shared knowledge or experiences from two regulatory jurisdictions – the Commonwealth (ARPANSA) and Victoria – as a reinstated standing agenda item.

The RHC received a presentation on ‘Understanding Australia’s Capability and Capacity in EPR’ which relayed the National Emergency Preparedness and Response capability survey results. The committee found the presentation to be informative and asked how Australia compares to international counterparts who have nuclear preparedness plans. It was acknowledged that Australia excels in some areas of emergency framework such as bushfire responses but there is scope for improvement in other areas.

The RHC received a second presentation on Victorian regulatory issues encountered with regard to the stage at which the warning lighting on medical computed tomography (CT) equipment

illuminates. It was shared that due to these issues there is a new compliance requirement for testers to include.

17 - Meeting Close

It was noted that the next RHC meeting would be on 23 November in Brisbane, Queensland.

Task: Circulate and provide to working groups the working group document development guidance @James Wheaton, Drummond, Roslyn 9/9/2022