



# Radiation Health Committee

## Meeting Minutes

<b>Date</b>	30 – 31 July 2024
<b>Time</b>	9:00 am – 5:20 pm (30 July), 9:00 am to 5:10 pm (31 July)
<b>Location</b>	Gurrumbuy Room, Level 6, 22 Mitchell St, Darwin Northern Territory; Microsoft Teams
<b>Members</b>	Dr Joanna Wriedt (Chair), Dr Gillian Hirth (CEO of ARPANSA), Mr Simon Critchley (QLD), Mr Glenn Riley (VIC), Mr Daniel Bellifemine (SA), Mr Bradley Feldtman (NT), Ms Hazel Upton (WA), Mr Nehal Ahmed (TAS), Mr Tom Sullivan, Mr Stuart Parr, Ms Fay Bellis.
<b>Invitees</b>	Dr Sieu Tran (NSW), Mr Radomir Krsteski (ACT), Rear Admiral Katherine Richards (NPSRD), Lieutenant Commander Sean Dowling (NPSRD), Mr Brent Le Vert (NZ), Dr Ivan Williams, Dr Marcus Grzechnik, Mr James Wheaton, Dr Arne Biesiekierski, Dr Fiona Charalambous.
<b>Apologies</b>	Ms Karen Marler (NSW).

---

### Meeting Opening and Housekeeping (Day 1)

The Chair acknowledged the Larrakia People as the Traditional Owners and Custodians of the land on which the meeting was held, paying respects to their Elders past and present.

The Chair introduced Mr Nehal Ahmed as the new member for Tasmania, and welcomed observers from New South Wales, the Australian Capital Territory, Nuclear Powered Submarine Regulatory Design, and New Zealand. No conflicts of interest were declared.

The draft March 2024 RHC meeting minutes were endorsed for publication with no changes. Action items from the previous RHC meeting were noted. The Chair also noted two items of correspondence received: one from the Australasian Association of Nuclear Medicine Specialists regarding a theranostics course, and another from the Chair of the Western Australian Radiological Council regarding recent changes to WorkCover legislation. Regarding the WA correspondence, it was decided to allocate time to this item at the next RHC meeting.

**Decision:** The March 2024 RHC meeting minutes were endorsed for publication.

**Decision:** Recent WorkCover changes to be discussed at the November 2024 meeting.

## Member representing the interests of the general public

The Member raised the potential risks for injury to the public from cosmetic applications of non-ionising radiation. The RHC noted the complaints received by jurisdictional regulators regarding cosmetic applications, and the difficulty experienced over more than a decade in regulating non-ionising radiation sources in this space. The implementation of import controls was raised as a potential means for controlling these sources.

**Decision:** Maintain a watching brief on developments and emerging trends from non-ionising radiation in cosmetic procedures.

## Working Group Updates

### Draft Code on Practice-Specific Requirements for Fixed and Portable Radiation Gauges

ARPANSA presented on the updated draft of the practice-specific code for the use of fixed and portable radiation gauges to replace Radiation Protection Series (RPS) 5 and RPS 13, addressing RHC member feedback, and a proposed timeline for public feedback and publication. The RHC discussed the need for additional quality management controls and certification across the full lifecycle of gauges, noting a report from the Radiological Council of Western Australia provided to RHC with recommendations in response to the 2023 lost radiation gauge incident in Western Australia. The RHC agreed to identify and incorporate changes to the draft code arising from tabled documents. Variations in gauge authorisation across jurisdictions was further discussed and it was agreed to collate a list of approved gauges and other relevant background material.

**Decision:** The RHC agreed to the proposed timeline to progress the draft code to publication.

**Task:** RHC Members to provide further feedback on the draft code by 30 August 2024.

**Task:** A working group (ARPANSA, QLD, WA) to identify necessary changes to draft gauges code based on the report from the Radiological Council of Western Australia.

**Task:** RHC jurisdictional representatives to provide information on existing gauge approvals and other relevant background material.

### Draft Code on Radiation Safety for the Practice of Well Logging with Sealed Radiation Sources

ARPANSA presented on the progress of drafting of an updated well-logging practice specific code to replace Radiation Health Series (RHS) 28, and a proposed timeline for public feedback and publication. Out-of-session feedback was sought on the draft code from members. The RHC agreed to the proposed timeline for progression, and for the draft Code to proceed to public consultation when appropriate, separately to the related Equipment Standard and Safety Guide.

**Decision:** The RHC agreed to the proposed timeline to progress to publication.

**Decision:** The RHC agreed for the draft Code to proceed to public consultation when agreed, separately to the related Equipment Standard and Safety Guide.

**Task:** RHC Members to provide feedback on the draft code by 30 August 2024.

## **Draft Code for Radiation Protection in Dental Exposure**

The ongoing work concerning the revision of the Dental Code of Practice (replacing RPS 10) was presented. Responses received from targeted consultation with the Australian Dental Association together with the resolution of those comments were discussed. It was agreed to proceed the draft code to public consultation. Additional discussion related to the challenges around preparing associated guidance and it was decided that guidance could be addressed separately to or following publication of the revised code.

**Decision:** The RHC agreed for the draft Code to proceed to publication when appropriate, independently of the associated Safety Guide.

**Task:** ARPANSA to circulate for public consultation the draft Dental Code of Practice.

## **National collaboration**

An updated draft of the letter to the CEO on which collaborative activities are important to regulation in Australia, including activities which promote uniformity was tabled and assent was sought from all RHC members. The RHC endorsed the letter to be sent to the CEO of ARPANSA from the Chair of the RHC.

**Decision:** The RHC endorsed the Letter to the CEO on National Collaboration.

## **Radiation Protection Series updates**

### **Minor updates to RPS 11 and RPS C-6, and confirmation of adoption of RPS C-6**

ARPANSA presented on matters relating to RPS 11, the “Code of Practice for the Security of Radioactive Sources”, and RPS C-6, the “Code of Practice for the Disposal of Radioactive Waste by the User”. Items included a minor change of text in RPS 11, the issuing of errata for an erroneous value published in RPS C-6 and replicated in the 2017 National Directory for Radiation Protection (NDRP), and queries to the radiation control officer members around the adoption of RPS C-6 within their own jurisdictions, and approval requirements for disposal. Assent was granted for the changes and errata, and feedback was provided on disposal practices, though members also noted differences in terminology around “disposal” between jurisdictions.

**Decision:** The RHC endorsed the change of text in RPS 11.

**Decision:** The RHC endorsed publication of errata for RPS C-6 and the NDRP.

### **Draft RPS Exemption and Clearance Guide**

A draft Project and Document Plan was tabled for the drafting of a Guide for the Exemption and Clearance of Radioactive Material, initiated in response to a recommendation resulting from the International Atomic Energy Agency (IAEA) Integrated Regulatory Review Service (IRRS) Mission in 2018 to provide guidance on these concepts. ARPANSA sought feedback on the proposed plan and timeline. No issues were noted with the timeline.

**Task:** RHC to provide feedback on the draft Project and Document Plan before Friday 30 August 2024.

### **Draft RPS Decommissioning Guide**

A draft Project and Document Plan was tabled for the drafting of a Guide for Decommissioning Facilities. ARPANSA sought feedback on the format, approach, and content of the document. The RHC supported in principle the document concept and timeline. However, the RHC was of the view that this publication should take the form of a code rather than a guide; this arose from jurisdictions noting their own facilities will require decommissioning in the future. ARPANSA will further consider this item, and pathways for proceeding.

**Decision:** RHC endorsed producing a decommissioning code subject to internal ARPANSA deliberations.

**Task:** ARPANSA to update the Project and Document Plan to reflect this project as being a code.

### **Dosimetry Service Provider Accreditation - Standards Australia Proposal**

The RHC discussed the proposed pathway to convert the Dosimetry Service Provider (DSP) Standard to a Standards Australia standard, for governance independence from ARPANSA's dual role as a service provider and to enable accreditation internationally. The RHC endorsed this pathway, subject to ARPANSA agreeing with Standards Australia and its connection with the International Standards Organisation (ISO) Technical Committee 85 (TC-85). Noting proposed publication timelines and RHC's previous endorsement, the RHC approved ARPANSA publishing the DSP standard on its website until such time as it can be published as a Standards Australia standard.

**Decision:** The RHC endorsed the conversion of the Dosimetry Service Provider Accreditation standard to a Standards Australia standard, subject to agreement between ARPANSA and Standards Australia.

**Decision:** The RHC approved the publication of the DSP Standard on the ARPANSA website until such time as publication can be taken up by Standards Australia.

## **New Issues to Consider**

### **Waste flows from hospitals**

The Western Australian regulator presented to the RHC regarding the justification for hospital waste holding tanks, and the recent Western Australian decision to remove the requirement for these tanks following a systematic analysis including of radiological activity throughout the sewer system resulting from nuclear medicine treatments. The RHC discussed the findings of member jurisdictions who had performed a similar analysis, or who were looking to do so in the near future. Jurisdictions agreed to share investigation reports, subject to obtaining clearance to distribute.

**Decision:** The RHC to circulate investigation reports from relevant jurisdictions pending clearances.

### **Theranostics**

ARPANSA presented to the RHC on the identified risk areas (as distinct from regulatory complications) related to the rise of combined diagnostic and therapeutic uses of nuclear medicine, known as theranostics. The RHC agreed there was a need for further information from users, and agreed to approach jurisdictional radiation councils for further information.

**Task:** ARPANSA to prepare a list of questions for jurisdictional radiation councils.

### **Mobile Computed-Tomography (CT)**

The RHC discussed feedback received from a survey distributed to jurisdictions, and ARPANSA provided information received from the Therapeutic Goods Administration. Staff from Micro-X also presented on the progress of their new mobile head CT system through clinical trials. Following the presentation, the RHC discussed this system, including its progression through clinical trials abroad. ARPANSA noted that it may be able to seek more information from a peer regulator abroad. The RHC also discussed broader concerns including around differing terminology across jurisdictions.

### **Remote servicing of radiation equipment**

The Victorian regulator spoke to recent discussions with their state radiation advisory committee concerning the servicing of radiation equipment through use of remote calling, and the potential risks to users and bystanders that may result. The RHC discussed whether this activity is currently captured by existing regulation, to what extent it took place, and for what purposes remote servicing was used. It was agreed to seek further information through circulating a questionnaire to operators, license holders, and manufacturers in the various jurisdictions.

**Task:** ARPANSA to produce a questionnaire to operators and manufacturers on this topic, for circulation by jurisdictions.

### **Urgent care clinics**

The Tasmanian representative spoke to a recently received request for a policy exemption to allow general practitioners (GPs) and nurses to take X-rays at Medicare Urgent Care Clinics (UCCs) located in urban settings. The current policy for radiation licensing of GPs and nurses is generally only applicable to remote area clinics where no radiographer is available. The RHC discussed challenges and risks around this proposal, and current practices in the different jurisdictions. The RHC noted the need for further clarity on how UCCs are handled in each jurisdiction.

**Task:** RHC members to provide information on policies for UCCs in their respective jurisdictions.

## **RPS Gap Analysis (Day 2)**

ARPANSA presented on work underway on a gap analysis of the current Radiation Protection Series (RPS) of national codes and standards. The purpose is to identify priorities for future work based on both identified present and future needs across nation, including the age and suitability of existing documents. The RHC discussed individual jurisdictional priorities, as well as likely future challenges, and agreed to provide feedback out of session. RHC members also raised the need for continued access to superseded RPS and related items, and ARPANSA agreed to consider establishing a regulatory document archive.

**Task:** The RHC to provide feedback to ARPANSA by 30 August 2024.

**Task:** ARPANSA to consider producing a regulatory repository for superseded publications.

## **IAEA and RHC linkages**

ARPANSA presented on plans to strengthen the links between the separate but related work programs of the IAEA and the RHC, and invited RHC to comment on possible mechanisms to facilitate this linkage. This includes enhancing jurisdictional regulators' awareness of, and input to, draft international safety standard publications and how the international best practice should be used to inform the revision of the Radiation Protection Series. RHC input was sought for a recent IAEA Member State Questionnaire relevant to this matter.

**Task:** RHC Members to provide feedback on processes which would facilitate Australian expert input to international standards.

**Task:** Radiation Control Officer Members to provide responses to the IAEA Member State CSS Questionnaire by Friday 30 August 2024.

## **IRRS Final Report**

ARPANSA tabled the IRRS Final Report to the RHC, which was prepared following the 2023 IRRS Final Review Mission and published recently. The RHC then discussed the action items identified in the report and the implementation thereof. Discussion included responsible bodies for the implementation of recommendations, where it was agreed that the RHC is the appropriate forum for maintaining awareness of and progressing these actions.

**Decision:** The RHC agreed that it was the appropriate body to drive and monitor the implementation of any remaining IRRS findings and recommendations.

**Task:** The RHC to revisit action items from the IRRS mission at the next meeting for discussion and progression.

## **Regulatory Knowledge Exchange**

The RHC heard from three speakers on items of potential interest to regulators: the member for the Northern Territory spoke to current developments, challenges, and perspectives in radiation regulation in their jurisdiction; ARPANSA spoke to the capabilities of the new Radiation Administration Database (RAD) portal for regulators; and the member for Tasmania spoke to a recent survey into practices and quality control in radiography across dental clinics in their state.

## **Opening of Joint Meeting between RHC and Council**

The Chair of the RHC welcomed into the room the members of the Radiation Health and Safety Advisory Council (the Council) and opened the joint meeting of the two bodies. This included a roundtable introduction of all members and observers present.

### **ARPANSA CEO Update**

The CEO of ARPANSA provided an update to the Council and RHC on ARPANSA activities. These included, but were not limited to: updates on advisory body activities; appearances of ARPANSA in parliament, along with questions taken on notice; the activities of ARPANSA's regulatory branch; the activities undertaken by ARPANSA's medical radiation branch; international engagement undertaken by ARPANSA; recent activities and developments relating to emergency management and preparedness; and the establishment of a framework for radiological environmental monitoring and assessment, including the activities of an ARPANSA working group to implement a pilot monitoring program in Western Australia using this framework.

### **Media Enquiries Dashboard**

ARPANSA presented on recent media enquiries received, noting the number of enquiries had increased compared to the same period in 2023. Key issues included enquiries around occupational radiation exposure of medical workers, the update of Australian sunscreen standards, the release of ARPANSA's radio wave exposure study in Melbourne, and the announcement of the Federal Opposition's policy for nuclear power.

### **Public enquiries dashboard**

ARPANSA provided an update on enquiries received from the general public through ARPANSA's Talk to a Scientist program. This included information the Council requested regarding updates to the program user flow, an in-depth analysis of user trends, and a comparison to international equivalents. Public enquiries were comparable in number to previous years, dominated by telecommunications and power infrastructure, and personal/occupational exposure to ionising radiation.

## Update on ARPANSA activities

### ARPANSA First Nations advisor

ARPANSA's First Nations Advisor presented on the purpose and progress of ARPANSA's Reconciliation Action Plan (RAP), which is currently in the Reflect phase. The applicability of the RAP to the advisory bodies was raised. ARPANSA also invited all members of the advisory bodies to the launch of the RAP tentatively proposed for later in August. The Council expressed interest in the progress of ARPANSA's RAP as it moves through subsequent phases.

### Radiation and Nuclear Event Plan Update

ARPANSA presented on its support and engagement with the National Emergency Management Agency (NEMA) and Department of Health and Aged Care (DoHAC) on plans and arrangements stemming from the Australian Government Crisis Management Framework review. ARPANSA is leading drafting of the Australian National Radiation and Nuclear Event Plan (AUSRNEPLAN).

### Australian Radioactive Waste Agency (ARWA) Stakeholder Engagement Fact-Finding Mission

ARPANSA presented on an ARWA-led fact finding mission, which ARPANSA attended alongside ARWA, the Australian Submarine Agency (ASA), the Australian Nuclear Science and Technology Organisation (ANSTO), and the Defence Nuclear Powered Submarine Regulatory Design Team. This included visits to operational and research waste repository sites in the UK, Sweden, and Belgium.

ARPANSA also presented on ARPANSA's participation in a separate roundtable discussion held in Canberra with the Canadian National Waste Management Organisation.

## Updates on RHC, NSC and RHSAC

### Standards and Guides for Council Endorsement

ARPANSA tabled the draft Standard for Radiation Safety and Performance Testing of Diagnostic Imaging Apparatus, which had previously been endorsed for publication by the RHC, and circulated for comment by the Council. With all changes finalised, it was presented to Council for final endorsement for publication, and subsequently endorsed pending a minor change to the Radiation Protection Series description on the inside cover. It will be published by ARPANSA as RPS S-2.

**Decision:** The Council endorsed the publication of the Standard for Radiation Safety and Performance Testing of Diagnostic Imaging Apparatus subject to minor corrections.

**Task:** ARPANSA to publish the Standard as part of the Radiation Protection Series.



## **Nuclear Powered Submarine Program Implementation**

### **Presentation by Rear Admiral Katherine Richards AM, CSC, RAN**

The advisory bodies heard a presentation from the Head of Nuclear-Powered Submarine Regulatory Design, Rear Admiral Richards on the progress of the establishment of the Australian Naval Nuclear-Powered Submarine Regulator (ANNPSR).

### **Licensing Decision and Public Consultation Outcomes**

ARPANSA's CEO provided an update on the public consultation and associated licensing decision for a low-level waste store (a 'Controlled Industrial Facility') on HMAS Stirling.

### **Nuclear Safety Code**

An update the progress on the draft Code for Reactor Facility Safety was given to RHC and Council.

### **RPS Gap Analysis**

ARPANSA presented work on the gap analysis of the current status and future work items of the Radiation Protection Series (RPS) including a summary of the RHC's separate deliberations earlier in the day, seeking input or feedback from RHC and Council members.

**Task:** The RHC and Council to provide feedback on the RPS Gap Analysis prior to 30 August 2024.

### **Other Business and Meeting Close**

The dates for the next RHC meeting was noted as 19 – 20 November, and the Chair thanked all members for their attendance and closed the meeting.