

# **Nuclear Safety Committee**

#### **Minutes**

**Date** 29-30 July 2025

Time 1:30 PM to 5:00 PM (day 1; items 1-3)

8:30 AM to 3:00 PM (day 2; items 4-19)

**Location** Osborne Naval Shipyard, Osborne SA (day 1)

11 Waymouth St, Adelaide SA (day 2)

Members Present Dr Tamie Weaver (Chair), Dr Gillian Hirth AO (CEO of ARPANSA), Dr Joanna Wriedt,

Mr Michael Parker, Dr Peter Karamoskos, Mr Tony Irwin, Dr Peta Miller, Mr Peter Wilkinson, Mr Stuart Parr, Mr Brent Rogers, Ms Jasmin Diab CSC (online only), Mr

Cameron MacPhail (day 2 only; online only).

Apologies Nil

Attendees ARPANSA: Mr John Ward, Mr Lachlan Whittle, Mr Jim Scott (CRO of ARPANSA), Mr

Ryan Hemsley (items 1 - 8), Ms Fran Wigney (items 1 - 8), Mr Vaz Mottl (items 14 - 16), Mr Andrew McCormick (item 16), Ms Christina Arthur (item 15), Ms Shazz

Dujikers-Mahood (items 3-4 & 6.4), Mr Rohan Mate (item 6.5).

NPSRD: CDRE Guy Holthouse, Mr Simon Robertshaw (items 2-3; online only), Mr Michael Haese (items 2-3; online only), Ms Courtney Ames (item 2-3; online only) ANI: Mr Andrew Seaton (CEO of ANI; item 1), Mr Loch Castle (item 1), Mr Sean

Temple (item 1)

ASA: Ms Jasmine Craufurd-Hill (item 1)

# 1 - Site Tour of Osborne Naval Shipyards

Australian Naval Infrastructure (ANI) provided the Nuclear Safety Committee (the Committee) with a briefing on the site characteristics of the Osborne Naval Shipyard, and details regarding the proposed Submarine Construction Yard. ANI has submitted a siting licence application for the Osborne Submarine Construction Yard which is undergoing regulatory assessment by ARPANSA. The NSC may be asked to provide advice on certain aspects of the application.

### 2 - Update on the Osborne Submarine Construction Yard Siting Application

ARPANSA updated the Committee on ARPANSA's assessment of the ANI siting licence application for a proposed Osborne Submarine Construction Yard which was submitted in April. The licence application was incomplete with a large number of documents required to support the site safety submitted in July. ARPANSA has also requested further information on radiological and nuclear safety which remains outstanding. In addition, documents which are required to be provided by the licence applicant to enable ARPANSA to go to public consultation will not be made available by the licence applicant until early

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September. This would only allow ARPANSA less than 2 months to undertake and complete resolution of a public consultation process, which is not appropriate for a proposed facility such as Osborne. At the current time, with the lack of complete public consultation documents, it is likely that a decision on the application will not be made before the Australian Naval Nuclear Power Safety Regulator (ANNPSR) is stood up on 1 November 2025. To mitigate the risk to the licence applicant timelines, ARPANSA has been working with the Nuclear-Powered Submarine Regulatory Design Team, which is conducting a shadow assessment of the application against the draft Australian Naval Nuclear Power Safety Regulatory framework.

# 3 - Update on public consultation for the Controlled Industrial Facility (CIF)

ARPANSA informed the Committee of the public consultation ARPANSA undertook regarding the construction application for a proposed CIF at HMAS *Stirling*, at Garden Island, Rockingham WA. The CEO of Rockingham Council, who is a member of the NSC, made comments concerning the CIF licence assessment process which are detailed under item 4 of these minutes.

Public consultation on the CIF opened on 11 June and closed on 17 July 2025. A community online information session was held on 2 July 2025 which was also attended by ASA and NPSRD, where attendees could ask questions. ARPANSA also uploaded a video to the <u>consultation webpage</u> detailing ARPANSA's licensing process. Committee members were informed of the online consultation session and multiple attended online.

In total, ARPANSA received 93 submissions for the construction licence application compared to 165 submissions which were received for the previous siting licence. Seventy per cent of these submissions were within the scope of ARPANSA's role as regulator and/or the scope of the licence application, which is an increase from the previous public consultation for the siting application for the CIF. Key themes included concerns around radiological safety, environmental monitoring, the lack of a Commonwealth radioactive waste disposal pathway in Australia and emergency response requirements.

The committee provided feedback on ARPANSA's draft written responses to the key themes raised in the submissions which also included questions asked at the public information session. This response will be published on the ARPANSA website once a licence decision has been made.

Committee members believed that ARPANSA staff responded well to questions from the public at the information session.

#### 4 - Update from the CEO of Rockingham Council

Mr Michael Parker, the CEO of Rockingham Council, provided feedback to ARPANSA regarding the CIF consultation process. Mr Parker expressed disappointment in the consultation process thus far, including that not enough consultation has taken place to date. Mr Parker raised feedback that the ASA documents published for consultation do not contain sufficient detail for people to be able to analyse for themselves the radiological impacts of the facility, including the detailed design. Mr Parker noted that face-to-face consultation would have been better received than an online session. He also noted that the inclusion of the operator in the online public information session could lead to the perception that ARPANSA is not independent.

The advertisement of public consultation was discussed with ARPANSA stating that it carried out more advertising than it normally would have. Despite this, Mr Parker noted a perceived lack of public awareness and advertising for the consultation process, including the online forum, and that the local member felt the need to take out a full-page advertisement due to the information her office was receiving.

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Mr Parker mentioned that the community information session finishing 10 minutes earlier than planned was perceived poorly. Mr Parker noted the lack of consultation by ASA regarding the radiological safety of the CIF. ARPANSA acknowledged this concern, but noted this was not under its jurisdiction.

Mr Parker noted the prominent community desire for real-time radiation monitoring if the CIF is approved to operate under a future operating licence application. Committee members supported this suggestion, identifying similar arrangements currently in place at Lucas Heights. Mr Parker noted that Rockingham Council has not been invited to assist in determining the location for a future operational environmental monitoring program by ASA to date.

Mr Parker suggested that a community reference group should be established. Multiple other Committee members agreed with this suggestion and identified international examples of industry where community reference groups have been established. The Committee agreed to issue a letter of advice to ARPANSA's CEO recommending the ASA engage with the community more regarding the radiological safety of the CIF. This includes future real-time radiological environmental monitoring and the potential development of a community reference group.

ARPANSA informed the Committee that it has undertaken significantly more consultation for the CIF than is typical for facilities of this nature, which usually require no regulator-led consultation, due to the relatively low radiological risk. ARPANSA also reiterated that public information sessions must include the operator, as it is the proponent's responsibility to provide specific details about the radiological safety of their facility. It is not appropriate for the regulator to speak on behalf of the applicant.

ARPANSA acknowledges the lack of consultation from the ASA regarding the radiological safety aspects of the CIF and noted that this put ARPANSA in a difficult position. The Committee agreed with this assessment. However, Mr Parker noted that ARPANSA's reputation has been perceived to be damaged by this consultation process and that an opportunity for ARPANSA to inform the community in a positive way has been missed.

#### 5 - Introduction

#### 5.1 - Opening

The Chair opened the Nuclear Safety Committee and gave an acknowledgement of the Traditional Owners of the land, paying respect to Elders past and present.

#### 5.2 - Attendance and apologies

All Committee members attended this meeting.

# 5.3 - Declarations of conflicts of interest, real, perceived or potential

Mr Cameron MacPhail declared a potential conflict interest due to a family member's employer.

#### 5.4 - Minutes of the previous meeting

Draft minutes of the March NSC meeting, were circulated out of session. The Committee discussed these minutes at the July meeting, resolved outstanding member comments, accepted the minutes.

The finalised minutes of the March 2025 meeting have been published on the ARPANSA website.

#### 5.5 - Meeting dates

The Committee will next meet on 19-20 November, 2025 in Canberra. Meetings will take place over one or both days depending on the meeting's agenda.

#### 6 - Business arising

#### 6.1 - Outstanding actions

The Committee noted that there are no outstanding actions.

#### 6.2 - Incoming correspondence

The Committee received no correspondence.

#### 6.3 - Outgoing correspondence

The Committee sent no correspondence.

#### 6.4 - Media enquiries update

The Committee was informed of media enquiries ARPANSA had received during the period of February 2025 – May 2025. ARPANSA received 11 media enquiries and was mentioned 89 times in the media. These enquiries were divided into: 64% online, 18% print, and 18% radio or TV. Sentiment analysis of media mentions found that ARPANSA was generally reflected neutrally, with very few overly positive or negative representations in media.

#### 6.5 - Public enquiries update

The Committee was informed of the enquiries ARPANSA received via the Talk to a Scientist program from January 2025 – June 2025. 298 enquiries have been received in this period, which is less than previous years due to the observed reduction in communication regarding mobile base stations. This may indicate that ARPANSA's publications on this topic are reducing community concern.

Most enquiries regarded the personal and occupational exposure to ionising radiation. Most enquiries regarding occupational exposure were submitted by medical professionals.

# 7 - Update on Australia's IAEA Convention for Nuclear Safety Report

ARPANSA updated the Committee on the current draft of Australia's IAEA Convention for Nuclear Safety Report.

Committee members stated they believed the current draft was a well-written document.

Action - The Committee was asked to provide any further comments on the report by 15 August 2025.

# 8 - Update on Regulatory Assessment Principles (RAPs)

ARPANSA updated the Committee on the current progress in drafting ARPANSA's RAPs.

**Action -** The Committee were requested to review the draft RAPs. Feedback is to be returned by 29 August 2025.

#### 9 - ARPANSA significant activities

#### 9.1 - Chief Executive Officer (CEO) update

The CEO of ARPANSA updated the Committee on recent ARPANSA activities. These included, but are not limited to: ARPANSA's international engagements; the CEO's recent visit to Finland's Onkalo deep geological repository; licence applications received; liaison forums with both the Australian Nuclear Science and Technology Organisation (ANSTO) and the Australian Radioactive Waste Agency (ARWA); changes in government following the May 2025 election, including Assistant Minister Rebecca White becoming ARPANSA's Minister; and ARPANSA's role in Australia's response to the Israel-Iran crisis in June.

## 10 - Member representing the interests of the general public

None, no correspondence from the public had been received

# 11 - Update on the establishment of the Australian Naval Nuclear Power Safety Regulator (ANNPSR)

The Committee were informed of recent activities conducted by Nuclear Powered Submarine Regulatory Design (NPSRD). This included the consultation undertaken thus far on the Australian Naval Nuclear Power Safety Regulations. The consultation period began on 2 July 2025 and will conclude on 30 July 2025.

NPSRD noted their intention to follow a similar consultation process as ARPANSA, in responding to submissions from the public, analysing themes, and hosting an online community information session. NPSRD perceived that ARPANSA's community information session resonated with its audience. NPSRD acknowledge the lack of consultation from ASA regarding nuclear powered submarines. During the NPSRD consultation many of the questions asked of NPSRD did not relate to the regulations under consultation, but on other aspects better responded to by ASA.

NPSRD raised that meaningful consultation is included as part of the ANNPS Regulations under section 42(2)(b). The Committee raised that there would be benefit in defining what 'meaningful' consultation would be and discussed community involvement in developing that definition.

# 12 - Update on ARPANSA's addition section 63 guidance

The Committee were updated on guidance ARPANSA has developed to better inform license holders of expectations surrounding applications for changes with significant implications for safety, as outlined in section 63 of the Australian Radiation Protection and Nuclear Safety Regulations (2018). A new submission guide contains detail on the concepts being assessed under the regulations, and how ARPANSA will assess applications.

The increased attention on how ARPANSA assessors are to use the guide is a departure from how ARPANSA has traditionally prepared guidance. ARPANSA changed its usual development approach by collaborating with ANSTO from the beginning to understand licence holders' needs before drafting. The mature draft was then reviewed and commented on by all licence holders. ARPANSA intends to apply the new approach taken in this guide moving forward.

#### 13 - Update to ARPANSA's Holistic Safety guide

ARPANSA updated the Committee on the work done to update its Regulatory Guide: Holistic Safety. This guide is ARPANSA's key document regarding technical, human and organisational factors (THOF). The Committee were informed of the development of the guide in-line with developments in safety science over the last decade, and in the attempt to structure the guide into a clear taxonomy of technical, human and organisational factors.

The Committee were also informed of how this guide will inform future regulatory activities, including a THOF inspection program. This guide was developed using a similar approach to the new section 63 guidance mentioned in item 12, where an increased focus was given to providing explanations of concepts and to how ARPANSA will apply the guide in conducting assessments and inspections.

The Committee discussed the guide and stated it was a well-written document that had been successful in capturing a broad topic. Suggestions were provided on aspects to improve, including opportunities for greater consistency across the guide, and individual factors in the guide which could be further developed. A suggestion was made that thought should be given to renaming the guide to more accurately reflects its content. The Committee recommended the development of internal guidance to further inform how ARPANSA assessors and inspectors will apply this guide.

Action - The Committee are to review the guide and return feedback by 8 August 2025.

# 14 - Update on the siting application for the Nuclear Medicine Manufacturing Facility (NMMF)

The Committee was updated on the work ARPANSA has conducted in assessing ANSTO's siting application for the NMMF. ARPANSA noted the need to apply a graded approach to this assessment as current guidance is aimed at nuclear reactors, which have a very different risk profile than a facility like the NMMF. At this stage the assessment is ongoing, with ARPANSA awaiting responses to requests for information.

#### 15 - Update on controlled facilities and inspections

ARPANSA informed the Committee of an ANSTO submission under section 63 regarding inspection frequencies the OPAL Riser. ARPANSA assessors have recommended the CEO approve the application, but this approval has not yet been granted. The Committee discussed ongoing options for managing the riser but reiterated that the OPAL riser is not classified as safety significant.

ARPANSA updated the Committee on the construction of ANSTO's SyMo facility, for which a section 63 application is intended to be submitted later in the year. The Committee were also updated on the decommissioning of ANSTO's HIFAR reactor, where phase 1A of the decommissioning is progressing as planned. The next inspection of HIFAR is planned for August 2025. An inspection of ANSTO Waste Operations was conducted in March 2025 where no significant issues were identified, however ANSTO later self-reported a breach which identified a radiation monitor had not been calibrated as planned. ARPANSA reminded ANSTO that repeated breaches may lead to enforcement action.

#### 16 - Update on ANSTO near miss incident

The Committee were informed of a recent inspection conducted by ARPANSA at ANSTO Health Products. This was a scheduled inspection with pre-determined scope. The inspection was conducted in the context of the near-miss at the facility in late 2023 and its similarity to ANSTO's 2017 hand contamination accident.

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The Committee were provided with details of the inspection findings, including an issue raised with risk assessment, and ANSTO's ongoing work in the identification and monitoring of critical controls. ARPANSA noted that this inspection involved THOF specialists within the agency in response to findings from the 2023 near-miss.

ARPANSA raised that it is investigating how to better influence long-term safety improvements at licence holders. This includes by ensuring lessons learned are shared across an organisation. This will require ARPANSA to look beyond individual licences within an organisation to the trends seen across organisations as a whole. ARPANSA also identified areas for self-improvement, including ensuring regulatory lessons learned from prior incidents and accidents, including the 2017 accident, are more widely shared within the agency to better prevent regulatory knowledge from being lost.

The Committee noted an opportunity to engage with co-regulators, this including Comcare and the Therapeutic Goods Administration (TGA). ARPANSA noted the ongoing working relationship Comcare, and more limited engagement with the TGA.

#### 17 - General reports

# 17.1 - Radiation Health Committee (RHC) update

The RHC last met on 25-26 June 2025. The RHC discussed ongoing engagement with the Australian Border Force regarding import permit controls. The RHC discussed draft guidance on exemption and clearance of radioactive material, and received details of a stakeholder webinar. The RHC also were updated on multiple codes on topics including radiation waste management, non-medical human imaging, and x-ray equipment.

Minutes of RHC meetings are available on ARPANSA's website.

#### 17.2 - Radiation Health and Safety Advisory Council (RHSAC)

RHSAC last met on 26-27 March 2025. The Council discussed national guidance for shielding design, installation and verification. The Council also discussed an item referred to them by the RHC, where guidance from Safe Work Australia resulted in changes to jurisdictional work safety regulations. These changes appear to consider exposure to ionising radiation as a presumptive cause for multiple diseases without making reference to radiation dose received or dose limits.

The Committee raised the possibility of establishing a working group in competencies in radiation.

Minutes of RHSAC meetings are available on ARPANSA's website.

#### 18 - Information on nuclear safety matters and regulatory activities

The Committee noted the item.

#### 19 - Meeting close

The next meeting of the NSC is scheduled for 19-20 November, 2025 in Canberra.