



## Executive Summary of the Defence-ARPANSA Liaison Forum (DALF) held on 17 June 2019

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### Terms of Reference

- Terms of reference for the Defence-ARPANSA liaison Forum (DALF) have been agreed by both Defence and ARPANSA. The current Terms of Reference, which are dated 10 May 2018 do not require amendment.

### Strategic View from ARPANSA's Perspective

- Australia requested an international review by the IAEA. The *Integrated Regulatory Review Service* (IRRS) team consisted of 20 members drawn from various regulatory agencies from around the world. Implementation of the IRRS recommendations will take place over the next few years.
- ARPANSA has installed a new linear accelerator in Melbourne and plans to base the *National Standard for Observed Dose* on this facility rather than the current sealed source standard.

### Strategic View from Defence's Perspective

- Defence has undertaken a review of its *Radiation Safety Management System* (RSMS). An updated version of the RSMS was approved and published on 13 June 2019.
- Defence has undertaken a review of the Defence Radiation Safety Manual (DRSM). An updated version of the DRSM was approved and published on 14 June 2019.
- Defence is currently in the process of implementing an electronic central dose register for all occupationally exposed members.
- Defence intends to upgrade facilities in order to meet the international best practices outlined in NSS-11.

### Update on ARPANSA Compliance Matters

#### *Regulatory Performance Framework*

- ARPANSA discussed the requirement for compliance with the new RPS C-1, which has recently replaced RPS-1, and advised Defence that future inspections would be assessed against it. Section 3.1.24 (dose records) was raised as a significant compliance requirement.

- ARPANSA is currently undertaking a review of RPS-3, through the Radiation Health Committee, but will continue to engage with its licence holders. ARPANSA agreed to consult with Defence during the review process

### ***Inspection Approaches and Lessons Learnt***

- ARPANSA's inspection schedule continues to be based on regulatory priorities, which aims to inspect high hazard sources more frequently than low hazard sources.
- Inspections usually result in the identification of areas-for-improvement (AFI), which aim for overall improvement in the licence holder's safety performance.

## **Update on Defence Governance and Assurance Issues**

### ***RadSafe Governance Update***

- Defence is considering its position in relation to ARPANSA's decision on the potential noncompliance for the use of dental x-ray during initial dental examinations. The timeframe to reach the final decision was discussed, with both parties agreeing that this issue is taking too long to resolve. It was agreed that some matters are more complex than others and will require more time.
- Defence raised concerns regarding the scope of ARPANSA inspections. It was agreed that Unit staff should not be expected to provide authoritative comment on a whole-of-Defence matter, such as Defence procurement processes or methodology. It was also agreed that inspections should focus on the sources and practices that are employed by the Unit and observed at the time of the inspection.

### ***Source Inventory Management Update***

- The quality, quantity and type of data provided by Defence as part of quarterly reporting was discussed. Defence's significant inventory holdings and dispersed locations were noted as a fundamental difference in comparison to smaller licence holders. It was agreed that further discussion would take place out of session to determine whether the current data provided during quarterly reporting met ARPANSA's expectations.

### ***Assurance Inspection Update***

- Defence is on track to perform 42 internal assurance inspections during the current financial year. In the main, the types of issue identified during Defence internal assurance inspections mirrored those found by ARPANSA during their compliance inspections.

### ***Facility and Precinct Update***

- The directorate responsible for radiation safety is planning to undertake necessary upgrades to the closed radioactive waste storage facility in order to meet NSS-11. ARPANSA will hold internal discussions about the adoption/implementation of NSS-11, and report back to Defence.

### ***Incident Notification and Reporting Update***

- Defence has undertaken to attach an extract from its corporate safety management reporting system to its quarterly reports. This extract will identify any significant radiation safety event that

occurred during the previous quarter. Automatic notification has been tested and is now working as expected.

- Discussion was held regarding a recent event reported through the corporate safety management system to ARPANSA as an accident. It was agreed by both Defence and ARPANSA that the event would be reclassified as an incident and updated via quarterly reporting.

### ***Inspection Reporting***

- Defence raised an issue with the identification of AFIs in ARPANSA inspection reports. In short, Defence noted that it was difficult to link the AFI statement listed at the end of a report with the relevant section of text in the body of the report. ARPANSA will seek to improve its reporting, especially in those areas noted as problematic during the drafting process.

### ***Licence Applications and Amendments Update***

- Not discussed at this DALF.

### ***Next Meeting***

- It is proposed that the next meeting be hosted by ARPANSA in Sydney, at a date yet to be agreed.
- An agreement was reached that holding 'mini-DALFs' on a regular basis would be beneficial for both parties, which could be achieved through teleconferencing. It was suggested the next mini-DALF could be held in July 2019.

### ***Follow up Tasks***

- Consider the options for dental radiography, including the possible submission of an exemption (Defence).
- Reclassify radiation event from accident to incident (Defence).
- Previous DALF minutes to be agreed and signed by 28 June 2019 (ARPANSA and Defence).
- Mini-DALF to be considered for July 2019 (ARPANSA).
- Procurement process inspection of CASG to be conducted (ARPANSA).
- Clarification of ARPANSA's stance on the adoption/implementation of NSS-11 (ARPANSA).
- Confirmation that CEO ARPANSA accepts that the DRSFI meets the requirements of licence condition 1 (effective control of inventory in a manner acceptable to the CEO) and that the inventory extract of the DRSFI, which is provided by Defence as part of quarterly reporting, is continuing to provide a useful adjunct to the inspection planning process (ARPANSA).