



Australian Government
Radiation Health Committee

Radiation Health Committee

MINUTES

Date:	15 June 2016
Time:	9:30 am to 4.30 pm
Location:	Wattle Room, ARPANSA Sydney Offices
Secretariat:	Ms Meaghan Partridge
Scribe:	Ms Meaghan Partridge
Members:	Dr Roslyn Drummond (Chair); Dr Carl-Magnus Larsson (CEO of ARPANSA), Mr Keith Baldry (SA); Mr Ross Bevan (ACT); Professor Brad Cassels (VIC); Mr Simon Critchley (QLD); Mr Leif Dahlskog (WA); Mr Len Potapof (NSW); Mr Nehal Ahmed (NT); Dr Stephen Newbery (TAS); Dr Peter Karamoskos (Public Representative); Dr Bruce Hocking (Member); Mr Robert Lyon (Nuclear Safety Committee Representative)
Invitees:	Mr John Ward (Section Manager – Continuous Improvement); Mr Leigh Crutchley (Assistant Manager, Governance and Operations, National Radioactive Waste Management Facility, Resource Division – Department of Industry, Innovation and Science); Mr Terry Marshman (Assistant Manager, Governance Administration, National Radioactive Waste Management Facility, Resource Division – Department of Industry, Innovation and Science); Mr Keith Dessent (Regulatory Officer – Source Control); Ms Tone Doyle (Chief of Staff – Office of the CEO); Mr Selva Kuma (Regulatory Officer – Regulatory Assurance)
Observers:	Dr Stephen Solomon (Chief Radiation Health Scientist); Mr Jack Dillich (Chief Inspector - Regulatory Services); Dr Ivan Williams (Chief Medical Radiation Scientist – Medical Radiation Services); Mr Peter Colgan (Section Manager – Regulatory Assurance)
Apologies:	Mr Robert Lyon

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1. INTRODUCTION & STANDING ITEMS

Item 1.1 Welcome by the Chair

Chair

The Chair welcomed the Committee and observers and noted Mr Lyon's apology.

Item 1.2 Minutes

Chair

The Committee noted that the minutes from the previous meeting held on 23 March 2016 were confirmed out of session.

Item 1.3 Action & Business Arising

Chair

The Committee was briefed on the status of the RHC action list, where all actions were either completed or appear on the Agenda

Item 1.4 Correspondence

Chair

The Committee noted the following correspondence:

1. Tasmanian Government advising that the Department of Health and Human Services would be pleased to participate in regard to the IRRS mission.
Noted
2. Department of Industry, Innovation and Science requesting the RHC to nominate an appropriate representative for the Waste Acceptance Criteria (WAC) Working Group for the National Radioactive Waste Management Facility.
Noted - Discussed at Item 2.2
3. Outgoing letter to Department of Industry, Innovation and Science (DIIS) advising the Chair will need to consult with RHC at the next meeting on 15 June 2016.
Noted - Discussed at Item 2.2
4. Outgoing letters to Ms Deb Farnworth-Wood, Australian Skin Clinics and Mr Kane Hammond, The Global Beauty Group advising there would be no increase of membership to the working group regarding Laser & IPL's for Cosmetic Purposes.
Noted
5. Outgoing letters to Mr Ged Kearney, ACTU; Mr Paul Ada – Energy Networks Association; Ms Jennifer Taylor – Comcare; and Ms Diane Smith-Gander – Safe Work Australia regarding regulation of Extremely Low Frequency (ELF) Electromagnetic Fields.
Noted
6. Safe Work Australia response to point 5 above.
Noted

Item 1.5 Public Interest Issues

Dr Karamoskos

A briefing was provided to the Committee on a meeting with the Traditional owners of the land surrounding the proposed NRWFM site. The nominated site is freehold, however there is native title on the bordering properties. The Traditional owners expressed their opposition to the location of the NRWFM at the proposed site. Additionally there is a high density of archeological sites containing a large number of artifacts in that region, and the first registered aboriginal song line in Australia runs through or near parts of the freehold area. The Traditional owners aim is to protect their heritage.

The Traditional owners were also concerned about the lack of transparency of the process. In particular, they believe the surveys are tainted as there is a financial incitement to participate in the site studies. They believe that there needs to be ground rules as to what constitutes 'community consent', who is included in the 'majority', and a wish to ensure that a history of exploitation of traditional lands is not perpetuated.

The Committee noted these comments, whilst concluding that they were largely for DIIS to consider.

Item 1.6 Conflict of Interest Declaration**All Members**

Mr Baldry advised that there is an interest in regard to his involvement with the NRWMF project considerations by the committee, due to the South Australian Nuclear Waste Storage Facility (Prohibition) Act 2000. However this does not create a conflict of interest

2. NATIONAL UNIFORMITY – ACTION/INFORMATION ITEMS**Item 2.1 2018 IRRS Mission to Australia****Dr Larsson**

Meetings have been organised between the CEO of ARPANSA and several regulators in several States and Territories, focusing on the 2018 IRRS Mission. Confirmation of participation in the IRRS has been received from TAS, NT and SA. Consultation with jurisdictions is still ongoing, and is looking positive in some States, particularly SA. An IRRS plan has been completed and suitable dates for self-assessment training will be advised before the end of this year.

Action 1: ARPANSA to share IRRS preparation plans with relevant states and territories, and advise of self-assessment training opportunities. (CEO/RA)

Item 2.2 Department of Industry, Innovation and Science – National Radioactive Waste Management Facility Project**Mr Crutchley & Mr Marshman**

Department of Industry, Innovation and Science provided an overview of the National Radioactive Waste Management Facility project and establishment of a Waste Acceptance Criteria (WAC) Working Group. DIIS advised that they are currently seeking nominations from relevant agencies in regard to a NRWMF operator. Over the next 12 months DIIS will develop the WAC while continuing their consultation with the community and development of a detailed business case for the Government. DIIS is requesting assistance from the members of the RHC in regard to WAC (see incoming letter Agenda Item 1.4(2)).

The Committee thanked DIIS staff for their briefing, and upon their departure discussed the incoming letter. The RHC determined that there would potentially be a conflict of interest for a RHC member to be on the WAC, and the Chair would respond accordingly. It was agreed that in the response the Chair could suggest persons with relevant expertise, for the consideration of DIIS.

Action 2: RHC Chair to correspond with DIIS, declining the invitation to nominate a RHC Member for the NRWMF WAC working group (Chair/CI)

3. RHC WORK PROGRAM – ACTION/INFORMATION ITEMS**Item 3.1 Project Update****Project Managers**

The Committee was advised that of the seven RHC projects currently underway, five are discussed in separate Agenda Items below, while the Amendment to Schedule 5 of RPS 3 has concluded and has been published on the ARPANSA Website, and the NDRP Amendment 7 on User Disposal is currently before the COAG Health Council for out-of-session approval.

Item 3.2 Medical Exposure Code (MEC)**Mr Critchley**

A current draft of the MEC was not tabled as 180 comments were still being resolved. The Preliminary Assessment for OBPR's consideration is also still under preparation. Comments received on references to the Government and the regulatory authority, the need for a chapeau statement on the 'requirements of the relevant regulatory authority' as well as the terms 'medical physicist' v's 'qualified expert', were discussed and resolved. There was an identified need to harmonise the formatting and terminology of the PEC and the MEC

Additional discussion occurred on the incorporation of dental and chiropractic procedures into the MEC, and the possible need to change the name of the Code. RHC agreed that the term 'responsible person' in relation to research and ethics committee guidance currently contained in RPS 8 could be an issue – i.e. is the 'responsible person' in the MEC the person (individual license holder) who initiates the radiation exposure, or the management of the university or hospital where the research involving radiation exposures takes place (management license holder)? Consequently, and depending on the answer, incorporation of RPS 8 may not need to be covered in MEC? Also in the paragraph on justification, 'should' needs to be changed to 'shall'.

NSW advised that there is a formal process by going through the National Directory and it needs to go through this process before consideration in proceeding with the document. Concern was raised by Dr Larsson in regard to committing resources for a document that may not be endorsed and implemented. WA has requested responses to their comments to assist with their approval.

Action 3: Provide Preliminary Assessment for OBPR review ASAP (MRS/SC)

Action 4: Provide Feedback to WA's comments ASAP (MRS/SC)

Action 5: Redraft MEC encompassing the changes discussed, and submit to November RHC (MRS/SC)

Item 3.3 Planned Exposure Code (PEC)**Mr Baldry**

A new version of PEC was tabled, along with comments resolution table addressing 193 comments from states and territories. Some comments were as for MEC above, and resolved likewise. Certain issues need to be reviewed, including emphasizing the use of the graded approach and addressing the loss of detail in comparison to that contained in GSR Part 3. A chapeau statement needs to be drafted for the reader, guiding them to GSR Part 3 for such detail.

The concept of having a separate piece of information with respect to each of the Planned Exposure Code, Medical Exposure Code, Existing Exposure Code and Emergency Exposure Code referencing that the responsibilities of government be placed into the NDRP was agreed as a sensible way to deal with the various responsibilities ascribed to government in the respective drafts of each document.

Other unresolved issues in the comments resolution table and in the margins of the new draft of the PEC would be considered by Mr Cassels; Mr Critchley and Mr Bevan within the next 6 weeks, leading to a new version ready for OBPR consideration. On the subject of a graded approach, Mr Baldry agreed to draft a Case Study for possible inclusion as an Annex.

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Queensland stated that as an overview document it is suitable, however, to be fully consistent with IAEA GSR Part 3 there may need to be a complimentary document, or alternatively adopt GSR Part 3 in its entirety. Chair noted that the RHC had previously determined that GSR Part 3 was not written in a form that could easily be adopted in Australian legislation as written. She noted further that the RHC needs to move forward and finish this document as it provides the requirements necessary for the Australian framework to align with the IAEA system of radiation protection for planned exposures.

A *tour-de-table* revealed that most States and Territories had concluded that the document was workable and that drafting should continue. NSW again mentioned the process of approval, stating that in their view a RIS had not been completed for the original RPS 1, which this PEC is expected to replace. Other members thought that this had been satisfactorily addressed in the email circulated under Action Item 6 arising from the previous meeting.

The CEO ARPANSA requested confirmation within one week from Victoria that they were happy for the document to proceed. He also sought the commitment from all jurisdictions to use the document, and ARPANSA would then continue to provide the necessary resources to complete the document, including liaison with OBPR. If there is no consensus commitment, this document will be removed from the agenda.

Action 6: Victorian counterpart to obtain commitment for PEC by end of June (BC)

Action 7: Draft chapeau covering GSR Part 3 and Government responsibilities (also use for MEC) (KD/SC)

Action 8: Draft Case Study on graded approach as an appendix to the PEC (KB/KD)

Action 9: Resolve outstanding comments on draft PEC, and add chapeau and case study so final edition can be sent to OBPR at end of July (KD/BC/SC/RB)

Item 3.4 Existing Exposure Code

Dr Solomon

An overview of progress with the Existing Exposure Code was provided to the RHC and feedback requested. RHC agreed that the requirements on government and the regulatory authority should be removed to a chapeau (same as for MEC and PEC above). If the result is not sustainable as a stand-alone document, consider making it a NDRP schedule or a RHC Statement, and include the reference level table therein.

Action 10: Comments to be provided within a month (Members/RHS)

Action 11: Finalise Preliminary Assessment and consult with OBPR as needed by end of July (RHS/FC/SK)

Action 12: Finalised document to be tabled at next RHC Meeting

Item 3.5 Emergency Exposure Code (EEC)

Dr Cassels

Dr Cassels provided the RHC with an overview of the Emergency Exposure Code and requested feedback. Western Australia advised they will need to have a closer look but there does not appear to be any issues. RHC agreed to modify the document with inclusion of a chapeau, and handle the result as outlined in 3.4.

Action 13: Comments to be provided within a month (Members/RHS)

Action 14: Finalise Preliminary Assessment and consult with OBPR as needed by end July (RHS/RA)

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Action 15: Finalised document to be tabled at next RHC Meeting**Item 3.6 ARIR Analysis for 2014 Incidents****Mr Ward**

An overview of 2014 reports to the Australian Radiation Incident Register (ARIR) was provided, which included the reporting levels of each State and Territory regulators. There are variations in reporting levels between jurisdictions but generally improved reporting has seen the numbers of incident reports increase by 200% in the past 3 years. This is in all likelihood a reflection of improved reporting, not an increase in the number of incidents. The improved reporting allows for more effective analysis of incident trends and offers a more valuable source of information that can be used to promote best practices.

ARPANSA is introducing a new website portal (part of ARPANSA's Customer Relationship Management (CRM) project), which will contain a password protected interface that will allow States and Territories to input/update ARIR information quickly and more conveniently. A demonstration was provided, and suggestions for improvement noted particularly the potential for misuse of the choice of "human error" as the cause of an incident. This portal will ultimately allow stakeholders to obtain reports for their jurisdiction. ARPANSA is also in the process of updating the ARIR web pages to provide more useful stakeholder information.

RHC Members noted the report and advised they were looking forward to the roll out of the CRM module.

Item 3.7 IPL Working Group**Mr Critchley**

A verbal update of progress was provided to Members. The comments resolution table is currently at 447 pages and a fulsome analysis is still to be completed. The issues raised are numerous and complex and the resolution process is therefore lengthy. It was noted that many of the issues raised are wider than the radiation protection issues typically of concern to the RHC, and it was suggested that the Working Group might consider the involvement of other bodies such as TGA (for equipment quality issues) and the Australian Health Practitioner Regulation Agency (AHPRA) (for professional standards and training issues).

Once complete, the RHC members are to view results and provide comments. Victoria and Tasmania Members will provide their assistance in the preparation of a draft decision RIS.

Action 16: Analysis to be circulated to RHC out of session by end of August 2016 (JJ/Working Group/RHS)**Action 17: RHC Members to provide OOS comment by end of September 2016 (Members/JJ)****Action 18: Based on above, table the re-draft Guide and RIS at the next RHC meeting (JJ/BC/SC/Working Group)****Item 3.8 Dual-Energy X-ray Absorptiometry (DEXA)****Dr Williams**

Comments were provided and a final and agreed document was produced to be published as a RHC statement.

Action 19: Post agreed statement on ARPANSA Website (MRS/CI)

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Item 3.9 Model Conditions for Industrial Radiography**Mr Dahlskog**

A progress report was provided on the overview of the Model Conditions for Industrial Radiography. RHC members are to provide feedback on tabled documents by end of July. After a two week turn-around industry consultation will be sought.

Concern was raised from the NT as the proposed licence conditions will significantly reduce the current limit of leakage from industrial radiography x-ray equipment from 5000 $\mu\text{Sv/hr}$ to 100 $\mu\text{Sv/hr}$. If these conditions are adopted, registration of existing x-ray equipment with leakage above 100 $\mu\text{Sv/hr}$, may become obsolete. There could be wider implication to the industry and appropriate consultation should take place before adopting these conditions. Questions were raised from NT and ACT whether these conditions will be included in the National Directory.

It was generally agreed that states and territories already had the power to adopt the draft license conditions under their respective legislation, and jurisdictions would confirm this or advise of an alternate process, by the end of July.

Action 20: RHC to provide comments by the end of July. (Members/AK/LD)

Action 21: Confirmation of State & Territory Regulators' power to approve, or advise of alternate process, by end of July (Members)

Action 22: Circulate updated paper OOS to NDT Industry, seeking comments (AK/LD)

Item 3.10 ANRDR – Dose Records for radiation workers in Australia**Dr Solomon**

An overview of the ANRDR was provided. There is a process being initiated by ARPANSA to collect dose records from workers (other than those in the uranium mining industry for which the dose register was originally designed) which will allow the preservation of employee's radiation exposure history at a minimal cost.

Action 23: Contact Names and email addresses from State & Territory to be provided to SS (Members)

Item 3.11 Public concerns regarding the suitability of RPS3 with reference to smart meters**Dr Cassels**

A submission was tabled seeking RHC support for making a more definitive statement, in conjunction with Australian Communications and Media Authority (ACMA), advising publicly that the collection of devices operating in the RF communications sector do not present any significant exposure by virtue of the small percentage of the standard that persons are exposed to. The recent ARPANSA Study over the greater Melbourne metro area has confirmed this via direct measurement, however RHC Members stated their function is not to promote any form of technology and this does not fall within the purview of the RHC.

4. GENERAL INFORMATION ITEMS**Item 4.1 International Liaison, publications & other items of interest****Secretariat**

Noted.

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Item 4.2 Public Interest in RPS/RHS Publications

Secretariat

The ARPANSA website statistics were noted. No issues were raised.

5. CLOSING

Item 5.1 Any Other Business

Chair

Dr Cassels provided a letter to Members of RHC Members in regard to Cone Beam Dental CT Equipment training within Victoria, which was **Noted**. He also raised public interest in ELF exposures in Melbourne due to increased terminal expansion, and advised on the need for ongoing review and monitoring to ensure all regulations are met.

Action 24: Dr Cassels to provide report for forwarding to RHC Members for information (BC/CI)

Chair noted it was Dr Cassels' last meeting with the RHC and expressed her thanks and the Committee's gratitude for his contribution since 1999. The Committee joined the chair in acknowledging Dr Cassels service.

Item 5.2 Next Meeting

Chair

The Chair advised the Committee that the upcoming date for the next RHC meeting is 16 November 2016 which is to be held at ARPANSA's offices in Sydney.

Next meeting	16 November 2016, Sydney.
Close	3:40 pm

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