



Inspection report

Licence holder: Department of Defence and Australian Defence Force (DoD)	Licence number: S0042
Location inspected: DoD site/units in New South Wales	Date/s of inspection: 25-26 September 2019
	Report no: R19/10859
<p>This inspection was conducted as part of ARPANSA’s baseline inspection program to assess compliance with the <i>Australian Radiation Protection and Nuclear Safety Act 1998</i> (the Act), the Australian Radiation Protection and Nuclear Safety Regulations 2018 (the Regulations), and conditions of source licence S0042.</p> <p>The scope of the inspection included an assessment of DoD’s performance against the Source Performance Objectives and Criteria (POCs). The inspection consisted of a review of records, interviews, and physical inspection of sources.</p> <h3>Background</h3> <p>DoD is licensed to deal with many different types of controlled material and controlled apparatus at its various Australian sites for scientific research, medical use, non-destructive testing (NDT) of objects, X-ray examination of objects and parcel examination.</p> <p>The main codes and standards applicable to these sources are those that appear in section 59 of the Regulations plus:</p> <ol style="list-style-type: none">1. Australian/New Zealand Standard <i>Safety in Laboratories – Ionising Radiations</i> (2018) (AS/NZS 2243.4)2. Code of Radiation Protection Requirements for Industrial Radiography (2018) (RPS C-4) <h3>Observations</h3> <p>In general, the management of safety margins at the DoD site/unit was found to be satisfactory. However, there appeared to be room for improvement in relation to the contents of the radiation management plan.</p> <h3>Performance Reporting Verification</h3> <p>The Defence Radiation Safety and Environment Section (DRSE) collects information for quarterly reports with input from each DoD site/unit. Once collected, the Radiation Safety Officer consolidates this information into one final report to ARPANSA. DoD’s quarterly reports have been submitted to ARPANSA in a timely manner in recent years, and contained relevant information, including details of compliance with the Act and Regulations.</p>	

Configuration Management

All controlled sources under the management of DoD at this site/unit were present and accounted for in relation to the DoD SIW.

Inspection, Testing and Maintenance

External contractors carry out maintenance and testing of the equipment.

DRSE has developed a schedule of internal assurance inspections of Australia wide DoD sites/units on a quarterly basis and this inspection was held concurrently with one of these scheduled internal inspections. It was proposed that this arrangement of joint ARPANSA inspections and DRSE inspections continue into the future.

Training

All personnel using NDT equipment held operator licences issued by the NSW Environment Protection Authority (EPA) radiation section. These were sighted for relevant staff during the inspection.

Event Protection and Emergency Preparedness and Response

The broader DoD policy and work health and safety plans outline event protection and emergency preparedness and response requirements for the site/unit. These were not assessed during the inspection.

Radiation Protection

DoD has demonstrated a commitment to radiation protection by establishing a policy to facilitate the safe and effective use of radiation across all Australian sites/units. Each section on each Australian site/unit operates under a comprehensive radiation management plan to achieve and maintain best practice and compliance with radiation legislation and ARPANSA licence conditions supports this commitment.

The following observations were, however, made during the inspection:

1. The NDT section's radiation safety plan, titled the Radiation Safety Management Plan (RSMP), contains many references to the state regulatory requirements and very little to those of ARPANSA. The RSMP, while otherwise quite comprehensive for the purpose of safety, needs to be rewritten.
2. Section 12.6 of the RSMP requires an annual review of the document but there was no evidence that this had occurred.

Security

There were no sources at the site that would invoke the requirements of RPS11. Civilians were not permitted access to any part of the site without a specific need to be there and then only with an appropriate security pass and a local escort.

Findings

The licence holder was found to be in compliance with the requirements of the Act, the Regulations, and licence conditions.

The inspection revealed the following **areas for improvement**:

1. The RSMP contained references to legislation that was not relevant to operation.

2. Annual reviews of the RSMP were not being performed in accordance with internal requirements.

It is expected that improvement actions will be taken in a timely manner.

No written response to this report is required
THIS REPORT WILL BE PUBLISHED ON THE ARPANSA WEBSITE