



## Radiation Health Committee

### Meeting Minutes

**Date:** 10 February 2021

**Time:** 10:00 am to 1:00 pm

**Location:** Virtual

**Chair:** Dr Roslyn Drummond

**Members:** Dr Roslyn Drummond (Chair); Ms Fay Bellis (Public Representative); Mr Mark Carey (NSW); Mr Glenn Riley (VIC); Mr Simon Critchley (QLD); Ms Penny Hill (ACT); Dr Massey de los Reyes (SA); Dr Carl-Magnus Larsson (CEO of ARPANSA); Dr Stephen Newbery (TAS); Ms Hazel Upton (WA); Mr Bradley Feldtman (NT) ; Dr Joanna Wriedt (Nuclear Safety Committee Representative)

**Secretariat:** Dr Samir Sarkar and Mr Selva Kumar, National Codes & Standards Section, ARPANSA

**Apologies:** Bradley Feldtman

**Invitees:** Dr Rick Tinker (ARPANSA)

**Observers:** Dr Gillian Hirth (Chief Radiation Health Scientist – ARPANSA); Dr Ivan Williams (Chief Medical Radiation Scientist – ARPANSA); Mr Jim Scott (Chief Regulatory Officer – ARPANSA)

#### 1. Introduction and Standing Items

##### Item 1.1 Welcome by the Chair

**Chair**

The Chair called the meeting to order and welcomed the members, observers and invitee, and welcomed the new member Mr Glenn Riley, Victorian representative.

#### 2. End-state of RPS documents

##### Item 2.1 Introduction

**Dr Larsson**

Dr Larsson emphasised that the main goal of this single-issue meeting is to ensure that Radiation Protection Series (RPS) documents are fit for purpose and cover all relevant aspects of radiation safety.

He suggested that a better mapping of the 'landscape' of the RPS documents would result in an improved structure that would facilitate their implementation by the jurisdictions. He requested members to constructively discuss and agree on a suitable structure and format for the RPS.

## Item 2.2 RPS Document Framework and the New Practice Specific Guide approach

Dr Tinker

Dr Tinker presented a potential RPS Document Framework and a new type of RPS document, viz., Practice Specific Guidance. He stated that the RPS Document Framework will enable RHC to continue to build a document system that can respond more efficiently and effectively to challenges facing radiation protection in Australia, including planning for future document development and ensuring the appropriate investment of resources. Once developed and published on the ARPANSA website, the Framework will provide a simple tool for communication and will provide improved stakeholder awareness, an ability to navigate radiation protection requirements, and advice, as provided in the RPS documents. Regarding Practice Specific Guidance he stated that such RPS documents will be underpinned by the evidence presented in 'workbooks' and will contain:

- Practice Specific Guidance directly related to relevant requirements in RPS C-1 (or any other relevant Code)
- measures recommended for good practice taking national and international practice into account
- regulatory expectations for an acceptable means of compliance for a responsible person
- guidance on plans and arrangements (e.g. safety assessments and radiation safety management plans)

Dr Tinker also suggested establishing an implementation plan to map out how Practice Specific Guides will be developed, and which RPS documents could be transitioned into the new format in future years.

Members noted the content of the presentation and discussed how the proposed RPS framework could be used in the regulatory process. Further discussion on this matter took place under Item 2.3 below.

## Item 2.3 Guidance and Regulatory Expectations

Dr Newbery

Dr Newbery referred to the draft Practice Specific Guide and Regulatory Expectations document developed for the *Code for Radiation Protection in Medical Exposure*, RPS C-5. He explained the approach to compliance expectations. He also explained how this can facilitate a graded approach to radiation protection by referring to the relevant clauses (3.1.17-3.1.19) of RPS C-1 that relate to safety assessment.

Dr Larsson stated that the proposed approach is similar to the one that already works well for ARPANSA. He suggested considering 'Practice Specific Expectations' rather than 'Practice Specific Guide' as a more suitable term for this category of RPS documents.

Detailed discussion took place on the RPS document framework approach, taking into account the hierarchy of documents and interdependency between documents to ensure that mandatory requirements are retained and traceable for uniform regulatory compliance. NSW supported the place of Codes, including practice specific codes where appropriate, in setting minimum mandatory performance requirements for people conducting radiation practices and regulators, in providing clear rules, a level playing field, OBPR assessment in document development, and enforceable 'must' statements; particularly in the context of radiation regulation as a 'protective' regime - given nature of hazard and delayed negative consequences of exposure. While NSW does not object to a new regulatory expectations document category to support mandatory codes, the suitability of practice specific codes for conversion to regulatory expectations should be carefully considered on a case by case basis.

Members noted that the proposed approach would help eliminate inconsistencies in application of the regulatory requirements. Furthermore, the proposed approach will obviate the Office of Best Practice Regulation requirement for regulatory impact statements.

Members noted the proposed RPS document framework approach and agreed that some further refinement would be required. A working group comprising Dr Newbery, Dr Tinker, Dr Larsson and Ms Bellis was formed to refine the RPS document framework approach, and the draft refined approach will be sent to members out-of-session for feedback. It was also agreed that the outcomes of the working group will be communicated to enHealth. Members requested the progress of this work be presented at the next RHC meeting in March 2021 for further consideration.

**Action 2021-01: Working group to refine the RPS document framework approach and the Secretariat to send the refined version to the RHC out-of-session.**

**Action 2021-02: Dr Larsson to communicate the outcomes of the working group to enHealth.**

**Action 2021-03: Dr Tinker to provide an update at the next RHC Meeting.**

**Item 2.4 Draft Guidance and Regulatory Expectations document for the Practice of Well Logging with Sealed Radiation Sources** **Dr Newbery**

Dr Newbery presented the draft *Guidance and Regulatory Expectations for the Practice of Well Logging with Sealed Radiation Sources* (revision of the *Code of Practice for the Safe Use of Sealed Radioactive Sources in Borehole Logging*, RHS 28). The approach and format of this draft document is similar to the one used for the guidance and regulatory expectations for the *Medical Exposure Code* RPS C-5. He stated that the draft document explains the process for demonstrating compliance with the requirements of RPS C-1. The content of the draft document is based on an IAEA Safety Standard entitled *Radiation Safety in Well Logging*, Specific Safety Guide No. 57, applying the workbook method. The draft document is an example of how an update of the existing RPS and/or RHS document can be captured under RPS C-1 with the addition of a Practice Specific Interpretation, Guidance and Regulatory Expectations document.

### **3. Closing**

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**Item 3.1 Any other business** **Chair**

Nil.