



Radiation Health Committee

Minutes

Date	26 May 2022
Time	10:30 AM - 5:00 PM
Location	Microsoft Teams Meeting and Yallambie, Melbourne.
Present	Dr Roslyn Drummond (Chair), Bradley Feldtman (NT), Dr Gillian Hirth (ARPANSA), Fay Bellis, Glenn Riley (VIC), Mark Carey (NSW), Penny Hill (ACT), Simon Critchley (QLD), Stephen Newbery (TAS), Joanna Wriedt, Daniel Bellifemine (SA)
Invitees	Sophie Dwyer (RHERP Chair), Nathan Wahl, Jim Scott, Ivan Williams, Rick Tinker, Katie Volter, Helen Alexander, Trent Furminger, Peter Thomas
Absent	Hazel Upton
Secretariat	James Wheaton

1 - Introduction

The Chair opened the meeting, respectfully acknowledging the Traditional Owners and Custodians of the land on which the meeting was held, paying respects to their Elders, past and present.

The Chair welcomed RHC members including those online, noting one apology. No conflicts of interest were declared, and the Minutes of the prior meeting (March 2022) were tabled with comments sought by 10 June 2022.

Task: RHC Members to review March 2022 Meeting Minutes.

2 - Member representing the public

The member representing the interests of the general public noted no correspondence had been received, and there were no further issues to be raised.

3 - Update from the CEO of ARPANSA

The CEO of ARPANSA, recently appointed, noted the importance of the RHC as a national asset and underlined the importance of sustaining RHC as an asset in its advice to ARPANSA and other forums for radiation protection and nuclear safety policy discussions such as the Environmental Health Standing Committee (under the Australian Health Protection Principal Committee (AHPPC)).

The CEO noted key current activities for ARPANSA. This included work related to the Australia-United Kingdom-United States (AUKUS) agreement, and associated nuclear-powered submarine

taskforce, as well as the commencement of preparations for an International Atomic Energy Agency (IAEA) Integrated Regulatory Review Services (IRRS) follow-up mission to Australia in October 2023.

The CEO also noted work on a draft agreement between ARPANSA and enHealth, to establish consistent engagement with policy and ministerial advisory stakeholders who are key to assisting with implementation of the codes, standards, and advice that RHC develops.

The CEO addressed current work in progress to update Radiation Protection Series (RPS) documents and related recent discussions at RHC about the overall framework for the RPS, setting a preference to reset the direction of the work on RPS documents to ensure that they are updated and useable in the immediate-short term. It was noted that discussions about the overall RPS framework can continue, including engagement with key policy stakeholders, as a parallel issue with a medium-long term timeframe which also considers broader national uniformity issues.

Resourcing for future RHC projects was also noted as an issue for future discussion, and the RHC separately also discussed the need for graduate programs which could grow a workforce with greater depth in STEM and considering diversity, inclusion, and gender in radiation protection.

4 - enHealth update

The Chair of the Radiation Health Experts Reference Panel (RHERP), which advises enHealth, gave an update on the work of RHERP as it intersects with RHC's work. The ARPANSA-enHealth agreement was noted again as being expected to help codify the relationship, and focus on regulatory implementation, but within the authority structure of enHealth up to the Ministers which is a key pathway for resolution of differences across Australian jurisdictions on implementation issues, such as licensing arrangements.

Other current issues noted were transport packaging security assessments, and emergency response capability and capacity across jurisdictions, noting the IAEA'S 2018 IRRS recommendations.

A noted advantage of the RHERP and enHealth perspective on these issues was that they sit within the AHPPC system which has recently handled similar issues in relation to national Covid-responses.

Radiation, as an issue which is no longer isolated from other health issues, was noted as also fitting into national and state systems, underscoring the importance of the National Strategy for Radiation Protection demonstrating the practical and coordinated steps required to achieve its objectives.

The RHC discussed its own involvement in the context of broader national systems, and it was recognised that contemporary and evidence-based standards which are the heart of any regulatory system. While RHERP discusses policy choices about how to give effect to safety requirements, the RHC plays a key role in defining safety standards and guidance through the RPS and providing valuable advice to government.

The RHC briefly discussed the overarching legislative framework for radiation protection in Australia, harmonisation opportunities, and the National Strategy as a key starting point for this discussion.

5 - X-Ray Apparatus Exemption

The RHC considered a recommendation for the ARPANSA CEO to refer a proposal to enHealth, for RHERP to consider the issue of regulatory exemptions for radiation apparatus. The RHC noted previous work through the radiation regulators network to compile a list of all exemptions across Australian jurisdictions, and separately, the publication of the second edition of the National Directory for Radiation Protection (NDRP) which also included a methodology for exempting x-ray apparatus based on the risk-based approach of the IAEA general safety requirements. It was noted that the next step needed may be to do an assessment of the radiation dose to operator, to determine what apparatus' fit potential exemption criteria.

As a regulatory implementation matter, the RHC discussed referring this issue to RHERP to consider how a schedule of legacy exemptions can be prepared to ensure that legacy exemptions are assessed in order of potential radiation safety risk (from highest to lowest); and, what process should follow the assessment of a legacy exemption in the situation where the exemption is determined to be unjustified (for example, will it trigger the need for a Regulatory Impact Assessment or a proposed amendment to Schedule 2 of the NDRP 2nd edition).

Decision: The RHC agreed to refer the issue of apparatus exemptions to enHealth (and RHERP).

Task: Refer the issue of radiation apparatus exemptions to enHealth.

6 - Competencies

The RHC discussed a recommendation for the ARPANSA CEO to refer the issue of radiation practitioner competencies to enHealth (and RHERP) to consider how radiation competencies and courses could be used for training users in various radiation practices as an implementation matter.

It was noted that in South Australia (SA) this work will tie in with Environment Protection Authority SA work to accredit individuals to assess competencies. It was also noted that the issue interfaces with AUKUS considerations around developing Australian capabilities and associated competencies.

ARPANSA noted that it can further consider mechanisms to seek funding further work at RHC in this area if there is policy support from enHealth for further work, and the RHC noted that any referral of this matter to enHealth could note that consulting ARPANSA will be key to any further work.

Decision: The RHC agreed to refer the issue of radiation competencies with historical information to enHealth (and RHERP).

Task: Refer the issue of radiation competencies to enHealth.

7 - Compliance Testing Standard

The RHC was presented with the working group's comments and proposed actions on each piece of feedback obtained from the public consultation of the draft compliance testing standard. The RHC noted in particular the issue of critical failures was raised in the public feedback. The original scope was noted as being to set a minimum standard, with further certification issues to be implementation policy decisions across jurisdictions.

The working group sought the affirmation of RHC members that their recommendations on how to address the feedback were appropriate, and support to complete the drafting work. The secretariat suggested that RHC members could provide any further comments out of session within two weeks.

Decision: The RHC agreed to support continued work to complete the draft standard.

Task: Compliance Testing Standard - RHC members to review and provide further comments on the working group's recommendations to address public feedback.

Task: Compliance Testing Standard - working group to finalise the draft standard.

8 - Dose Conversion Factor update

ARPANSA noted that stakeholder engagement is now complete with additional minor feedback now incorporated into the final document which will be published on ARPANSA's website in due course.

9 - Draft revised RPS 10 - Code for Radiation Protection in Dentistry

The RHC considered a draft revised RPS 10 (Code for Radiation Protection in Dentistry) and proposal to continue the redrafting work and produce a replacement for RPS 10.

The RHC noted the work done to date including the approach of working with experts and specialists in the dental field. It was suggested that a revised draft should go through a similar process to the development of the Medical Exposure Code (MEC), while filtering out any code requirements that overlap. Cone beam computed tomography (CT) was noted as an important consideration. It was suggested the RHC could consider producing a guidance document on extra-oral cone beam CT, and Tasmania agreed to share its recently developed guidance document for consideration. The RHC discussed consulting closely with key professional stakeholders as part of the drafting process.

Decision: The RHC agreed to establish a working group to consider a draft revised RPS 10, with a lead from Queensland, and further members from Victoria and support from ARPANSA.

Task: Secretariat to circulate the Tasmanian guidance on extra-oral cone beam CT.

Task: RHC members to consider and provide feedback to the Secretariat on the proposal for a draft guidance document on extra-oral cone beam CT.

Task: RHC working group to further consider the draft revised RPS 10 and report back.

10 - Review of RPS13 and RPS 5 (draft RPSXX Radiation Gauges) and well-logging

The RHC considered a draft new RPS code which would replace both RPS 5 (*Code of Practice and Safety Guide for Portable Density/Moisture Gauges Containing Radioactive Sources, 2004*) and RPS 13 (*Code of Practice and Safety Guide for Safe Use of Fixed Radiation Gauges, 2007*). It previously (June 2020) had discussed combining these into a single portable and fixed radiation gauges code.

The RHC noted that a few jurisdictions refer to the existing codes as licence conditions, and that the existing codes are reasonably fit for purpose. The RHC discussed whether work on a new radiation gauges code would take priority over well-logging code, which was identified as a priority. However, with the existence of a substantive draft it was discussed that work could continue without being onerous. ARPANSA agreed to support the combination of the two existing codes into a guidance document, which the RHC agreed should be in the form of a code, drawing on the IAEA's Specific

Safety Guide on Radiation Safety in the Use of Nuclear Gauges (SSG58). The RHC also proposed progressing separate work on a draft code for well-logging for further consideration.

Decision: The RHC agreed to proceed with considering a draft radiation gauges code combining RPS 5 and RPS 13. A working group was established including a lead from Victoria, with members from Western Australia, New South Wales, Queensland, and support from ARPANSA.

Decision: Simultaneously consider a draft code for well-logging.

Task: Review the draft Radiation Gauges code for consideration at the August RHC meeting.

Task: Prepare a draft code for well-logging for further RHC consideration.

11 - Guidance for Implementation of Medical Exposure Code

The RHC was asked to consider a final draft guidance document on diagnostic and image guided radiology, which RHC had requested in support of the finalised Medical Exposure Code. The RHC had previously (November 2020) endorsed the document in terms of approach and content, with further consultation and drafting amendments also subsequently noted (March 2021).

The RHC also discussed the style of guidance needed for radiation protection in radiotherapy and nuclear medicine, with a suggestion that these may take the form of, or include, a radiation management plan, which lays out a holistic approach to patient and work radiation safety. The RHC discussed also using a template approach for veterinary and dental guidance. It was noted that engagement with relevant professional colleges in developing these guidance documents would be critical, given the differing style from the existing RPS safety guides.

Decision: The RHC agreed that the draft guidance on diagnostic and image guided radiology met the needs of regulators, and that draft guidance on nuclear medicine and radiotherapy be circulated.

Task: RHC members to provide comments on the MEC Guidance on radiation protection in nuclear medicine by 23/6/2022.

Task: RHC members to provide comments on the draft Regulatory Expectations in Diagnostic and Imaged Guided Radiology by 10/6/2022.

Task: MEC Guidance on radiation protection in radiotherapy to be circulated out of session.

12 - Review of Workbook for RHS21 RHS22 and RHS9 - New Code Content

The RHC was provided with work-to-date comparing three existing Radiation Health Series (RHS) documents on x-ray equipment safety against the Planned Exposure Code. This was an outstanding RHC active project as of 31 March 2021 and the work completed in the interim was provided for consideration and decision on next steps.

The RHS documents reviewed were RHS No. 9 (*Code of Practice for Protection Against Ionizing Radiation Emitted from X-ray Analysis Equipment, 1984*), RHS No. 21 (*Statement on cabinet X-ray equipment for examination of letters, packages, baggage, freight and other articles for security, quality control and other purposes, 1987*), and RHS No. 22 (*Statement on enclosed X-ray equipment for special applications, 1987*). Further discussion suggested incorporating CT x-ray apparatus and backscatter / hand-held XRFs in the review.

Decision: The RHC agreed that the work completed should be used to develop a new code in-line with the current RPS framework. A working group was established with a lead from the Northern Territory, and members from Victoria, Western Australia, and support from ARPANSA.

Task: Circulate existing draft of revised RHS21/22/9 to the working group.

Task: Prepare a draft revised code on x-ray equipment safety and report progress at the next RHC meeting in August 2022.

13 - RHC Work Program review

The RHC was updated on other RPS documents currently under review as part of its work program.

In relation to RPS 8 (*Code of Practice for the Exposure of Humans to Ionizing Radiation for Research Purposes, 2005*), it was noted that further work on this is now deferred while a recently established International Commission for Radiological Protection (ICRP) task group completes work to update Publication ICRP 62 (1992), which will form a key reference point to any update of RPS 8.

In relation to RPS 11 (*Code of Practice for the Security of Radioactive Sources, 2019*) it was noted that ARPANSA is progressing work on an issues paper to identify outcomes (policy problems) before re-drafting of the code commences. The RHC agreed to provide its previous work on RPS 11. It was raised that cyber-security could be considered as an element for inclusion in a revised code.

The RHC discussed background checking mechanisms, and a suggestion that jurisdictions consult with police services, but a 'national scheme' was identified as preferable by some members. This is now with RHERP under their work program.

Task: Provide previous work on RPS 11 for referral within ARPANSA.

14 – Other Business and Meeting Close

The RHC discussed intense-pulsed lights (IPLs) noting this issue is now an active topic of discussion under the proposed National Strategy for Radiation Protection. Separately, the Victorian regulator has been contacted with CT cabinet operators who are replacing lead curtains with new-material curtains, with testing having been provided demonstrating compliance.

ARPANSA noted recent discussions with Australian Border Force around mechanisms for exemption thresholds, based on IAEA exemption levels, for import permits issued under the Customs (Prohibited Imports) Regulations 1956. ARPANSA raised the need to understand any possible implications for State and Territory regulators of applying exemption thresholds for import permits.

The RHC noted draft revised South Australian regulations for radiation protection are now out for public consultation, highlighting the area of interplay between state and Commonwealth regulation of the same or similar facilities. It was also noted the South Australian regulator is going through the process of regulatory assessment for the South Australian Health and Medical Research Institute's (SAHMRI) new facility, the Australian Bragg Centre for Proton Therapy and Research, and acknowledged the input of ARPANSA.

Decision: Date of next meeting is 25/8/2022.

Task: Secretariat to confirm the location of the next RHC meeting.