



Radiation Health Committee

Meeting Minutes

- Date:** 18-19 November 2020
- Time:** 10:30 am to 2:30 pm (18 November); 10:00 am to 1:00 pm (19 November)
- Location:** Virtual
- Chair:** Dr Roslyn Drummond
- Members:** Dr Roslyn Drummond (Chair); Ms Fay Bellis (Public Representative); Mr Mark Carey (NSW); Mr Noel Cleaves (VIC); Mr Simon Critchley (QLD); Mr Bradley Feldtman (NT); Ms Penny Hill (ACT); Dr Bruce Hocking (Member); Dr Massey de los Reyes (SA); Dr Carl-Magnus Larsson (CEO of ARPANSA); Dr Stephen Newbery (TAS); Ms Hazel Upton (WA); Dr Joanna Wriedt (NSC Member)
- Secretariat:** Dr Samir Sarkar, National Codes & Standards Section, ARPANSA
- Scribe:** Ms Meaghan Partridge
- Apologies:** None
- Invitees:** Mr Ryan Hemsley (ARPANSA, for items 1.7 and 2.1)
 Mr Tobias Hills (SA, for item 2.7)
 Mr Glenn Riley (VIC, for items 2.5 and 2.8)
 Dr Rick Tinker (ARPANSA, for items 3.5, 3.6 and 3.8)
 Dr Peter Thomas (ARPANSA, for item 3.2)
 Dr Ken Karipidis (ARPANSA, for item 3.3)
 Mr Loch Castle (for item 3.7)
- Observers:** Dr Gillian Hirth (Chief Radiation Health Scientist – ARPANSA); Dr Ivan Williams (Chief Medical Radiation Scientist – ARPANSA); Mr Jim Scott (Chief Regulatory Officer – ARPANSA); Mr Thomas Ashby (Commonwealth Department of Health);

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 invitees, and outlined the etiquette rules for this virtual meeting.

Item 1.2 Minutes

Chair

The Chair noted that the minutes from the previous meeting held on 2-3 July 2019 were confirmed out of session and had been posted on ARPANSA's website.

Item 1.3 Actions and Business Arising**Chair**

All items were either completed or on the agenda for the current meeting. Item 12 - *Budget issues for code and policy development* is currently on hold.

Item 1.3a CEO's letter to enHealth regarding regulation of emissions of/exposures to non-ionising radiation (NIR)**Dr Larsson**

Dr Larsson advised that the letter will now be finalised for submission to enHealth, noting the easing of the pandemic and associated workload. He noted that this matter is related to the proposed RPS S-1 (see item 3.3). It was agreed to keep this item on the action item list.

Item 1.4 Correspondence

The members noted the following correspondence:

- An email from the RHC Secretariat to RHC Members requesting to complete the IAEA Occupational Exposure in Medicine, Industry and Research (ISEMIR) Industrial Radiography (IR) Survey.
- An open letter from Environment & Communities Safe from Radiation Inc (ECSFR) providing comments on the draft "Standard for limiting exposure to radiofrequency fields – 100KHZ to 300GHz (RPS S-1). It was agreed that this submission will be considered along with other submissions received during public consultation (see item 3.3).
- An email from an external service provider to the RHC public representative advising that they want to offer accredited laser safety and infection prevention control courses that are nationally recognised and was requesting guidance from the RHC about accreditation. The RHC requested ARPANSA to directly respond to Alma Laser Australia.

Action 2020- 34: ARPANSA to provide a formal response to Alma Laser Australia

Item 1.5 Public Interest Issues**Ms Bellis**

See item 1.4.

Item 1.6 Conflict of Interest Declarations**All members**

Nil

Item 1.7 International liaison**Mr Hemsley**

Mr Hemsley advised that International travel has ceased due to COVID-19. The IAEA and other international organisations have moved to virtual means for meetings, webinars and conferences, with ARPANSA staff attending relevant meetings.

The review meetings (RM) under the Convention on Nuclear Safety (CNS) and the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management (JC) have been proposed to be deferred. Australia has completed the national report for the 7th RM of the JC. In the event the RM is deferred, and similar to the CNS, contracting parties' views will be sought on how best to use the information provided in the national reports.

Other international events have also been affected, such as the 67th session of the United Nations Scientific Committee on the Effects of Atomic Radiation (UNSCEAR), which Dr Gillian Hirth, as chair of the Committee, attended remotely.

ARPANSA is working with the Australian Mission in Vienna to optimise the opportunities for attending virtual meetings. ARPANSA is sharing such information through GovTeams and ARPANSA's website.

Dr Newbery suggested that meetings between ARPANSA and State/Territory jurisdictions prior to important international meetings would be beneficial. Mr Hemsley agreed and will approach the jurisdictions about the type of meetings that would be of particular interest. He will work on a way forward for such preparatory meetings. Dr Hirth suggested meetings between ARPANSA and State/Territory jurisdictions prior to the International Atomic Energy Agency (IAEA) safety standards committees' meetings would be of value. It was generally agreed that virtual meetings offered potential for a broader participation of Australian Regulators to have increased input to the early stages of document development

2. National Uniformity

Item 2.1 Integrated Regulatory Review Service (IRRS) action plan

Mr Hemsley

Mr Hemsley stated that the IRRS action plan is under the oversight of enHealth and its Radiation Health Expert Reference Panel (RHERP), and not within the purview of the RHC. He suggested to remove this as a standing item of the RHC agenda. Members agreed.

Action 2020-35: Secretariat to remove this item from the RHC agenda.

Item 2.2 Radiation Protection Network (RPN) activity update

Dr Newbery

Dr Newbery advised that the RPN had been transformed into a community of practice and had reached out to a broad range of regulators. Licencing systems and processes have been reviewed and discussed, as well as regulatory tools used for making decisions. The exchange of information through the RPN has been generally effective.

Dr Newbery informed that several RPN projects, including common compliance standards and structural shielding are progressing satisfactorily. Members noted the update.

Item 2.3 RHC interface with enHealth/RHERP

Dr Tinker

Dr Tinker provided a presentation on RHC/EnHealth interface considering the roles and functions of these committees and the way forward to avoid duplication of efforts. He also presented a tentative 3-year plan for the RHC by defining the possible end state of RPS documents.

Members agreed with the presented approach towards the future workplan for the RHC.

Members noted that the RHERP was initially tasked to deal with the IRRS recommendations and the role of this panel would end after the implementation of the IRRS recommendations. However, it is up to enHealth to consider any forum once this role of RHERP ends, including the continuation of RHERP. Considering the role of enHealth, Dr Larsson stated that enHealth is the communication conduit with government policy implementation for RHC, and all RHC communication should be directed at enHealth. Members suggested a

formal document describing how all committees can work together, taking into account the functions and roles of RHC and enHealth, would be beneficial to get effective outcomes and requested ARPANSA to draft a document in this regard. This will be an agenda item for the next RHC meeting.

The end-state of RPS documents was discussed in terms of codes & standards, guides and regulatory expectations. Members considered that regulatory expectations would be beneficial for regulatory assessment for decision making and for the purpose of compliance. It was agreed that the regulatory expectations documents should be RHC documents. In order to determine the end-state of RPS documents and the process of achieving that end-state, members agreed to have a single-issue meeting focusing on this particular issue.

Action 2020-36: ARPANSA to draft a document on optimal enHealth/ RHC interactions.

Action 2020-37: The Secretariat to organise a single-issue meeting to discuss the end-state of RPS documents (practice specific codes, guides and regulatory expectations documents) and the process of developing such documents.

2.4 Competency requirements - non-medical

Dr Newbery

Referring to the paper presented at the RHC meeting in July 2020, Dr Newbery provided the status of the 'competency requirements - non-medical' for users of fixed radiation gauges or mobile soil density and moisture gauges. Members noted that the document was well-structured and appropriately described the competency and assessment requirements for a qualified expert.

Members discussed the form of the publication of this document and agreed that it would be appropriate to publish this document as an RHC Statement. The document will be sent out of session to the members for finalisation. Members also agreed to continue developing competencies for other non-medical users of radiation sources.

Action 2020-38: Secretariat to circulate the document on 'competency requirements - non-medical' for users of fixed radiation gauges or mobile soil density and moisture gauges to the members out of session.

Decision 2020-06: Members to continue the work on competencies for other non-medical users of radiation sources.

Item 2.5 Mapping exercise on medical competency requirements

Mr Cleaves/Mr Riley

Mr Riley advised that he had extracted available information from the websites of all jurisdictions in this regard. He requested all jurisdictions to provide all/any of their requirements that are not listed on their website, for each type of medical and dental practitioner to Mr Cleaves/Mr Riley. Ms Bellis indicated that she would assist in preparing the medical competency requirements. Dr Newbery referred to the discussion with the Medical Radiation Practitioners Board (MRPB) and indicated that MRPB's Ministerial Council will also consider this issue, which will be useful for this purpose. He indicated that the MRPB could discuss this matter with enHealth. Mr Riley will provide an update at the next meeting.

Action 2020-39: Jurisdictions to provide competency requirements for each type of medical practitioner to Mr Cleaves/Mr Riley before the next RHC meeting.

Item 2.6 Competency requirements – medical

Dr Newbery

See Item 2.5 above. Item 2.5 and Item 2.6 will be considered as a single item in future meetings.

Item 2.7 Third-party Accreditation – course training providers and the development of accreditation standards

Mr Hills

Mr Hills presented the South Australian scheme to accredit third party certifiers for radiation use licences, advising that this is a national uniformity opportunity, particularly relating to competency requirements. The South Australian Environment Protection Agency (EPA) is progressing a scheme to accredit certifiers of radiation use licences with the intent of making this process as cost neutral as possible. There could be an accreditation committee for these courses.

Mr Hills advised that the draft accreditation policy is based on two processes of competency assessment, namely, competency of the accredited party and competency of persons to be certified by the accredited party. The South Australian EPA is seeking feedback from organisations that use radiation. In addition, training organisations, ARPANSA and RHC members will also be consulted on this draft policy. Mr Hills was requested to update the Committee on this matter at its next meeting.

Action 2020-40: SA to provide an update at the next RHC meeting.

Item 2.8 Exemption of cabinet X-ray apparatus

Mr Riley/Mr Cleaves

Referring to the paper on ‘Cabinet X-ray Case Study’ presented at the November 2019 meeting Mr Riley stated that the methodology described in the IAEA General Safety Requirements (GSR) No. Part 3 suggests that this equipment could be exempted from some or all licensing and registration requirements due to the low radiological hazards associated with such apparatus. However, in order to demonstrate compliance with requirements I.2 (a) and I.3 (c) of GSR Part 3, additional information on personal dosimetry would be needed.

Following discussion on this matter members acknowledged that the dose from such apparatus is very low. Mr Scott stated that ARPANSA does not require to monitor the personal dose since the level of dose is normally below the minimum recordable dose. Dr Newbery stated that he would look at Tasmania’s dose record.

Members were requested to provide available dose monitoring data to Mr Riley. Mr Riley will provide an update at the next RHC meeting in March 2021.

Action 2020-41: Jurisdictional members to provide available dosimetry information to Mr Riley by 25 December 2020.

Action 2020-42: Mr Riley to provide an update at the next RHC meeting in March 2021.

Item 2.9 RHC Statement on personal dosimeters and CT-baggage scanners

Mr Carey

Mr Carey advised that relevant information including the list of personal monitoring devices with images was provided to the Department of Home Affairs. He was seeking copyright approval for images from one device manufacturer. One manufacturer claimed that there was essentially no dose to the personal dosimeters from the CT baggage scanner. The Department of Home Affairs is working on a draft policy

statement based on the provided information. The Chair advised that this could be published as an RHC Advisory Note. Members suggested to continue the work to finalise the statement and to provide an update at the next meeting.

Action 2020-43: Mr Carey to provide an update at the next RHC meeting.

3. RHC Work Program

Item 3.1 RHC projects update

Dr Sarkar

Dr Sarkar presented an update on progress of the current RHC projects. Several projects were subsequently discussed under agenda items 3.1.1 to 3.7.

Item 3.1.1 Revision of RPS and RHS documents

Dr Sarkar/Dr Newbery

At the July 2020 meeting members agreed to a work plan for the expedited review and updating of several RPS Codes. RHS 24, *Code of Practice for the design and safe operation of non-medical irradiation facilities* (1988), is one of them. Dr Sarkar Presented the workbook containing the results of review against the IAEA Specific Safety Guide (SSG) No. SSG-8 on *Radiation Safety of Gamma, Electron and X-ray Irradiation Facilities*. The review found that RHS 24 is out of date and does not conform to the requirements of the *Planned Exposure Code*, RPS C-1 (Rev.1) 2020. He suggested to revise this document with priority and requested RHC's advice on the end-state of this document.

Members agreed to progress the revision of this document by expanding the scope to include other types of facilities such as cyclotrons, neutron-irradiators, etc. Discussion took place on the type of the document to be produced, including whether it would be a regulatory expectations document. Members considered that the planned single-issue meeting would be useful to define the end-state of this document along with other RPS/RHS documents (RPS 13, RHS 28, RHS 21 & the Dental Code), as well as the process of defining the end-state.

Action 2020-44: The Secretariat to include this item in the planned single-issue meeting.

Item 3.2 Guidance for implementation of the Medical Exposure Code (MEC)

Dr Newbery

Dr Newbery presented the background to the development of this document and stated that it is a practice specific regulatory expectation document. He explained the benefits of this type of document such as it will obviate the need for a regulatory impact statement. Consultation with the Australian Health Practitioner Regulation Agency (AHPRA) is ongoing.

Dr Larsson suggested to clearly define the expectation document as it is a supplement to the Code, and he was supportive of the approach. He referred to ARPANSA's regulatory guide to licence holders which in many cases are expectation documents.

Members discussed the details of the basis and content of this document and its link with the Medical Exposure Code (MEC). They were supportive of the approach. Members considered that it would be useful to review this document in 12 months after implementation of the MEC.

Members endorsed the document in terms of approach and content, subject to review, 12 months after implementation of the MEC. It was agreed to defer the finalisation of this document until the single-issue meeting.

Decision 2020-07: Endorsed the document approach and document content, and deferring finalisation of the documents until the planned single-issue meeting.

Action 2020-45: RHC to review the document 12 months after implementation of the MEC.

Item 3.3 Revised RPS 3 (RPS S-1)

Dr Karipidis/Dr Hocking

Dr Karipidis advised that the draft RPS S-1 went out for consultation on 31 August with submissions to be received by 30 September 2020. Following requests, the consultation period was extended until 21 October 2020. He stated that ARPANSA will liaise with relevant stakeholders and subject matter experts in addressing the comments, and the draft Standard is expected to be revised, addressing stakeholders' comments, by the end of 2020. It was noted that the correspondence received under item 1.4 formed part of the submission received from stakeholders. The revised Standard will be sent to the RHC out of session for approval. Dr Hocking suggested developing supplementary information related to this document and Dr Karipidis stated that ARPANSA was contemplating developing such document, noting that the document type is yet to be decided.

Dr Larsson advised that the RHC endorsed Standard will be sent to the Radiation Health and Safety Advisory Council (RHSAC) for advice in accordance with the publication process for Standards and Codes.

Action 2020-46: Secretariat to circulate the revised RPS S-1 to the RHC out of session for endorsement.

Item 3.4 Preliminary assessment on the Regulatory Guidance for implementation of personal dosimetry service providers

Mr Cleaves

Mr Cleaves informed that he had consulted ARPANSA's General Counsel regarding the legal aspects of the accreditation process for personal dosimetry service providers. He stated that a regulatory assessment style document would be presented at the next RHC meeting. Mr Cleaves suggested considering competitiveness of service, competition neutrality and perception of how we the accreditation body would be set up to avoid conflict of interest in this document. Members noted the update on this matter.

Action 2020-47: Victoria to present a proposal for consideration of adoption and possible inclusion in NDRP 2 on "Regulatory Guidance for Implementation of Personal Dosimetry Service Providers", at the next RHC meeting in March 2021.

Item 3.5 Australian National Radiation Dose Register- Advisory Board to develop a work plan for developing a guidance for regulators

Dr Tinker/Dr Lawrence

Dr Lawrence advised that the second meeting of the Advisory Board was held to obtain endorsement for a strategic directions document that will provide a roadmap to plan projects and to engage with dosimetry service providers. These projects will ensure easier access to data and information. It is planned to start engagement with dosimetry service providers early next year.

Considering the scope of the work program, Dr Tinker asked whether implementation of the ANRDR should stay with the RHC. Members discussed the involvement of ARPANSA and other jurisdictions in this project

and agreed that the project should remain with the RHC. However, enHealth will be kept informed of this project as it relates to an IRRS recommendation.

Regarding funding of the program Dr Tinker informed that ARPANSA is working on the cost recovery model. The Board will continue to report to the RHC regarding the ANRDR activities. Members noted the progress of the ANRDR Advisory Board workplan.

Action 2020-48: ANRDR Board to continue to report to the RHC regarding the ANRDR activities.

Item 3.6 Cosmetic laser and IPL injury register

Dr Tinker

Dr Tinker advised there is nothing to report against this item other than that RHSAC will have a special single-issue meeting on lasers, noting that Council members are engaged and knowledgeable in this area. Ms Upton stated that there had been changes to laser regulation in WA and she would find more information on laser injury in WA. Members discussed the use of enHealth to deal with the reporting on laser and IPL injuries and agreed that it is worth exploring this issue with enHealth. Mr Cleaves stated that there is an enHealth paper related to regulation of non-ionising radiation and requested jurisdictional members to continue to pursue the enHealth pathway.

Action 2020-49: Ms Upton to provide an update on changes in regulation of laser in WA at the next RHC meeting in March 2021.

Action 2020-50: Jurisdictional members to liaise with their enHealth member about non-ionising radiation to ensure they are fully briefed to consider this issue when considered on their agenda.

Item 3.7 Sealed source register and security background checking network

Mr Carey/Mr Castle

Mr Carey informed that this project is progressing through RHERP as it is related to an IRRS recommendation. Members agreed that it would not be productive to report to two committees on the same matter and decided to remove this item from future RHC agendas.

Decision 2020-08: This item to be removed from the RHC agenda.

Item 3.8 Online RPS Glossary - governance and administration plan for the online glossary

Dr Tinker

Dr Tinker advised that currently the focus is on terms and definitions used in the Guide for Radiation Protection in Emergency Exposure Situations, Radiation Protection Series G-3 (2019) and Fundamentals: Protection Against Ionising Radiation, Radiation Protection Series F-1 (2014) , but all RPS documents will be considered in the development of the online glossary. Use of relevant IT infrastructure has been explored to ensure that search options in various documents for the same terms are available. He stated that RHC will be consulted once the glossary of terms is drafted. Mr Cleaves suggested also considering the terms used in licences to maintain uniformity.

Dr Hocking said there was a need for better definition of occupational and public exposures. Specifically, "occupational" should not simply be people at work but a defined group(s) of workers with (planned) exposure to the radiations in question. Public exposure would include any other people at work as well as

members of the public. He instanced the clear definitions of occupational and public exposures within the new Radiofrequency Standard RPS S-1.

Dr Tinker stated that he would report back on the progress of this item at the next RHC meeting.

Action 2020-51: Dr Tinker to report on the progress on online glossary at the next RHC meeting in March 2021.

4. General Information Items

Item 4.1 Nuclear Safety Committee (NSC) update

Dr Wriedt

Dr Wriedt advised that the NSC met on Friday 13 November and was provided with ARPANSA's Compliance Manual (previously known as Compliance and Enforcement manual), which is currently under stakeholder consultation. The manual uses a graded approach in dealing with non-compliances. The NSC suggested to emphasise risk and a risk-informed approach to managing non-compliances.

Dr Larsson provided an update on ARPANSA's activities related to the National Radioactive Waste Management Facility (NRWMF) and the establishment of the Australian Radioactive Waste Agency (ARWA). He informed that the amended NRWMF bill is delayed, and ARPANSA attended Senate Estimates through virtual means and responded to the questions related to inventory, classes and storage of radioactive waste. Members noted the update.

5. Closing

Item 5.1 Any other business

Chair

Item 5.1.1 Farewell to two departing members and the RHC 2021-2023 triennium

Chair/Dr Larsson

The RHC noted the departure of Dr Bruce Hocking ('other' member) and Mr Noel Cleaves (Victoria) from the Committee. Dr Drummond and Dr Larsson thanked the outgoing members for their service and dedication, on behalf of both the Committee and ARPANSA.

Members expressed their gratitude to Dr Hocking and Mr Cleaves. It was noted that Dr Hocking had been a member of the RHC since 1 January 2015. His significant contribution to the development of RPS S-1 was highlighted. Mr Cleaves had been a member of the RHC since 1 July 2016. He was thanked for all his contributions, which were too numerous to mention.

Dr Larsson advised the appointment of the RHC for the 2021-2023 had been finalised. He welcomed Mr Riley as the new member for Victoria.

Item 5.1.2 Sharing information on events with safety implications

Dr Larsson/Dr Williams/Members

Dr Williams informed that ARPANSA's Clinical Dosimetry Service (ACDS) had recently performed audits of megavoltage radiotherapy practices and observed some issues related to mechanical isocentre of the medical linear accelerator, radiation isocentre of the photon beam and cone beam CT for medical imaging,

which may have regulatory implications. Members considered that it would be beneficial to share such information through the RPN.

It was agreed that every jurisdiction would present an update at each meeting under this standing item.

Action 2020-51: Jurisdictional members to present an update at each meeting.

Item 5.1.3 MOU's between ARPANSA and State and Territory Regulators

Mr Scott

Mr Scott advised that since ARPANSA regulates its own facilities, it utilises the expertise of other jurisdictions for compliance monitoring and/or review of licence applications of ARPANSA facilities in order to ensure process integrity and to avoid conflict of interest. He referred to an IRRS suggestion related to finalisation of MOUs with State/Territory jurisdictions. He informed that ARPANSA have signed MOUs with NSW EPA and Tasmania's Department of Health and have reached out to WA and ACT. A generic MOU has been drafted and will be forwarded to the remaining States and Territories for review.

Item 5.1.4 National Occupational Licensing Project

Mr Cleaves

Mr Cleaves informed that the likely commencement date for implementation of the 'National Occupational Licensing Project' is 30 June 2021. A Commonwealth Bill to amend the Mutual Recognition Act is now in early draft form and is likely to become public in late December 2020. The project will impact on the issue of use/operator licences across all jurisdictions.

Item 5.1.5 Legacy waste and predisposal management of radioactive waste

Dr Newbery

Dr Newbery stated that the New Zealand Department of Health is dealing with legacy waste in New Zealand and is in contact with the Tasmanian Department of Health and the Australian Radioactive Waste Agency about preconditioning of waste for disposal.

Item 5.1.2 Next Meeting –24-25 March 2021

Chair

It was agreed that the single-issue meeting will be held on 10 February 2020 through virtual means, focusing on the 'RPS end state' and associated issues.

The next full RHC meeting will be held on 24 -25 March 2021. Details of the meeting will be circulated in due course.