



Defence-ARPANSA Liaison Forum (DALF)

Executive Summary of 06 September 2021

Terms of Reference

The meeting was held in accordance with the Terms of Reference for the Defence-ARPANSA Liaison Forum (DALF TOR), dated 23 Sep 20.

Review Outcomes of Previous DALF

- The Executive Summary from the previous DALF, dated 23 Sep 20, was accepted by both parties, with copies being made available on both the ARPANSA and DRSA websites.
- All tasks arising from this meeting have been completed as follows:
 - A Defence-ARPANSA technical exchange on personal dosimetry was held 16 Nov 20. PRMS discussed their implementation of OSL technology and DRSA outlined the dose measurement and reporting requirements for their dealings.
 - A revised source inspection program, based on the Defence source inventory that was filtered for ARPANSA regulatory priority and arranged by geographical location, was used as the basis for planning the WA campaign in Jun 21. Both Defence and ARPANSA agreed that the revised program worked well and will continue to be used for future inspections.

Strategic View from ARPANSA's Perspective

- The CEO highlighted the challenges affecting both the regulator and licence holders as a result of the COVID-19 pandemic. The issues were largely focused on the difficulties with conducting compliance activities due to border closures, and challenges associated with domestic travel. Staff in the Sydney office are currently working from home, whereas there is approximately 25% attendance in the Melbourne office for critical tasks. The CEO mentioned that the DALF had now been in place for 15 years, and due to its continued success, has been used as the model for other licence holders.
- The CEO is leaving ARPANSA with effect Mar 22, and this would be his last DALF.

Strategic View from Defence's Perspective

- A/CJLOG thanked the CEO ARPANSA for his contribution to the DALF over the past 12 years, and acknowledged the achievements of the DALF during this period.
- A/CJLOG summarised the effects of the pandemic on Defence's internal assurance inspection program. Defence Radiation Safety and Assurance (DRSA) inspections have been suspended, with the exception of the Koolymilka RWSF, which continues to receive quarterly inspections. The next inspection is planned for Oct 21.
- Internal Defence committees and working groups continue to be held, albeit by virtual means.
- An update on the Koolymilka RWSF was provided. The security alarm upgrade and planning for an emergency exercise were discussed in detail.
- Because the recent NHEMS Radiological and Nuclear Survey was not sent to Defence via LAB-DRSA (as the sole POC for Defence radiation safety matters), there was unnecessary confusion in compiling a Defence response. A/CJLOG reinforced the need to address Radsafe communications through DRSA.

Update on ARPANSA Regulatory Matters

Inspection Approaches and Lessons Learnt

- The Chief Regulatory Officer indicated he was pleased Defence was continuing to action Radsafe matters as a priority during the pandemic.
- As a result of lockdowns being experienced in most States/Territories, physical compliance inspections would only occur in the event of emergency situations or accidents. ARPANSA will instead focus on conducting virtual inspections in the short term.

Regulatory Matters

- Requests for exemptions have been approved as follows:
 - R20/05561 - Defence S0042 - Gaseous Tritium Light Devices - 23 Sep 20
 - R21/07252 - Defence S0042 - Aerosol neutralisers using low energy x-rays - 17 Aug 21
- Defence proposed an amendment to the Regulations to include laser range finders with power output less than 5mW as an exempt dealing under Section 44(7). This is proposed for inclusion in the 2022 amendment.
- There have been five Section 65 transfer/disposal applications approved since 07 Sep 20.
- There will be a slight increase to the licence fees in the coming FY. Defence indicated that it is aware of this increase.
- The Director Facility Safety advised that Licence Condition 6 will be removed from F0252 as the SAR was now complete.

Human and Organisational Factors Integration Plan

- ARPANSA provided an overview of the Human and Organisation Factors (HOF) Integration Plan, whose vision is 'a world-class, integrated HOF regulatory system that fosters licensee safety performance'.
- Defence proposed that DDRHM would be an appropriate POC for assisting in the plan's development.

Visiting Ships Panel (Nuclear)

- ARPANSA provided an overview of the Visiting Ships Panel (Nuclear) (VSP(N)), recommending a refresh of its governance arrangements. As these arrangements currently lie outside the ARPANS Act, its management, resourcing and internal control arrangements are therefore unregulated. Pending the refresh, ARPANSA suggested that DRSA should attend panel discussions as a Radsafe adviser.

Update on Defence Governance and Assurance Issues

Radsafe Governance Update

- Defence provided an update on its policy framework and governance arrangements, and advised all Plans and Arrangements are current. Updates are actioned as a priority.

Source Inventory Management Update

- Defence noted an error in its Source Licence (Item G2-14(d) Clock, watch, heritage object ...), which needs to be amended. ARPANSA agreed and will re-issue the licence.
- The introduction of the Source Location /RP hazard map has allowed Defence to better target its resources to sources with a higher degree of risk. The map has also improved coordination of DRSA and ARPANSA inspection priorities.

Assurance Inspection Update

- Defence completed seven assurance inspections in FY20/21 compared to 17 in FY19/20. This reduction is directly related to the COVID-19 pandemic.
- DRSA has completed a project to upload all Defence Radiation Safety Plans to the Defence corporate document management system, giving DRSA an improved ability to conduct desk top inspections.

Facility and Precinct Update

- Defence provided a brief update on the Koolymilka RWSF security alarm system upgrade (real time CCTV with remote monitoring). DRSA are currently working to update security requirements and emergency planning arrangements. Defence requested an extension from ARPANSA to defer a planned emergency exercise until late 2022. ARPANSA indicated a preference for the emergency planning exercise to be completed by the end of FY21/22, COVID-19 permitting.

- F0252 - the updated SAR has been finalised and provided to ARPANSA.
- F0300 - the apparatus is currently undergoing commissioning trials with the assistance of ANSTO.

Radsafe Incident Notification and Reporting Update

- There have been no significant radiation safety incidents in FY20/21.
- There has been three incidents where Passive Personal Dosimeters (PPD) received higher than expected readings. All incidents have been investigated and attributed to the PPDs being passed through CT baggage scanners.
- DDIREG advised Defence had released internal guidance on the correct process for passing PPDs outside scanners, and incidents of this type were discussed at the relevant Defence committees.

Licence Applications and Amendments Update

- DRSA is working with the Health System Project Office to ensure Defence has the appropriate licence categories to deal with its new suite of computed tomography and interventional radiography apparatus.
- DRSA intends to commence work on two facility licence applications. Further, Defence will seek an exemption from the requirements to decommission the old JPEU 3 MeV Linac.
- DRSA is working with E&IG to develop a Section 63 request to support contractors in the remediation of World War 2 munitions buried on Defence sites.
- DRSA has assessed the recent changes to Section 9 of the Regulations against a number of NIR capabilities and is working with ARPANSA RB on appropriate licence categories or exemptions.
- DRSA is working with ACMA and DSO on the adoption of RPS-S1 for radiofrequency communications and radar (in line with the proposed changes to spectrum class licences).

General Business

- ARPANSA's Senior Regulatory Officer Safety Systems advised more information on the HOF integration project will be released in the coming months.

Next Meeting

- It is proposed that the next meeting be hosted by ARPANSA in Sydney, approx. Sep 22.

Follow Up Tasks

- Defence to consider placing a DRSA representative on the VSP-N.
- ARPANSA to re-issue Defence Source Licence updating Category G2-14(d).