

# Defence-ARPANSA Liaison Forum (DALF)

*Executive Summary of 07 October 2022 DALF Meeting*

---

## 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 2020.

## Review Outcomes of Previous DALF

- The Executive Summary from the previous DALF, dated 06 September 2021, was accepted by both parties, with copies being made available on both the ARPANSA and Defence Radiation Safety and Assurance (DRSA) websites.
- All tasks arising from this meeting have been closed out, which includes ARPANSA re-issuing the Defence Source Licence.

## Strategic View from ARPANSA's Perspective

- The ARPANSA CEO welcomed the new Commander Joint Logistics (CJLOG) to his first DALF meeting. This was also the first DALF meeting for the ARPANSA CEO in her new role.
- The CEO highlighted the need for capabilities and capacities in radiation protection within Australia, with both organisations needing to support future work in this area. Universities and STEM education have a role to play, however further government support in the framework is desirable. ARPANSA is also reintroducing its graduate programme, and looking at staff movements, to support its future workforce capabilities.
- The CEO highlighted the challenges affecting both the regulator and licence holders as a result of the COVID-19 pandemic and resourcing issues. This has included restrictions on travel, significant blocks of leave being taken by staff in the regulatory area, and a backlog of inspections and applications.

## Strategic View from Defence's Perspective

- The CJLOG welcomed the new CEO of ARPANSA.
- Defence noted it is looking at further utilisation of certain optical (laser) and radio-frequency radiation technologies. ARPANSA confirmed its regulatory role in relation to these sources would

be focused on the public and occupational safety considerations, particularly where sources could exceed the relevant exposure limits.

- CJLOG summarised the management of remediation works being undertaken in association with the disposal of historical material, which included radiological material.
- CJLOG noted that Defence did not expect to have any significant issues with the proposed ARPANS Regulations amendments. However, there may be some areas related to the new requirements on Emergency Preparedness and Response that will require a review of current practice.

## **Update on ARPANSA Regulatory Matters**

### **Inspection Approaches and Lessons Learnt**

- The Chief Regulatory Officer indicated he was pleased that a number of physical inspections of Defence have recently occurred, as during the pandemic there was limited on-site presence due to travel restrictions.
- The use of Source Location/Regulatory-Priority mapping to assist targeting inspections is expected to continue. Additionally, ARPANSA will work with Defence to ensure that the inspection covers all relevant sources/functions of a site, to ensure efficient use of regulatory resource.

### **Regulatory Matters**

- Recent amendments to the ARPANS Regulations included the Defence proposed amendment to include laser range finders with power output less than 5 mW as an exempt dealing under Section 44(7).
- ARPANSA has applied modified disposal requirements for low-risk sources. Specifically, prior approval from ARPANSA is no longer required to dispose of low-risk Group 1 controlled apparatus that do not contain radioactive material (e.g. laser and UV sources, baggage scanners). Defence will still be required to report quarterly on disposal of such apparatus. This modification only applies to permanent destruction or return to suppliers rather than transfers or sale of unwanted equipment.

### **The Australian National Radiation Dose Register (ANRDR)**

- ARPANSA discussed the requirement that occupational exposure dose reports for Defence personnel are to be uploaded to the ANRDR as required by the Planned Exposure Code. Defence has indicated that they will raise the priority for the uploading of data to the ANRDR; however, as Defence has unique requirements regarding the identification of personnel in specialist roles, privacy concerns have been delaying their ability to provide the full data requirements. ARPANSA indicated that it has helped other licence holders overcome both data conversion issues and concerns related to privacy issues.
- ARPANSA noted that Defence would not be compliant with regulatory requirements and would need to apply for a specific exemption/exception if there were specific circumstances preventing compliance. Defence indicated they would work with ARPANSA to achieve a satisfactory outcome in this regard.

## Areas for improvement and lessons to be learnt

- ARPANSA provided an overview of the 'Areas for Improvement' inspection outcomes through an interactive data visualisation.

## 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.

### Source Inventory Management Update

- There have not been any significant updates to the inventory and changes continue to be submitted to ARPANSA periodically.

### Assurance Inspection Update

- Defence completed 11 assurance inspections in FY21/22 compared to 7 in FY20/21. This increase is due to fewer restrictions related to the COVID-19 pandemic and the improvement in inspection numbers is expected to continue.

### Facility and Precinct Update

- Defence provided a brief update on the Koolymilka Security upgrade and noted that the emergency exercise was still planned for the near future, and that the safety analysis report was still undergoing development, as noted in the past two inspections.

### Radsafe Incident Notification and Reporting Update

- There have been no significant radiation safety incidents in FY21/22.
- Defence continues to experience incidents where Passive Personal Dosimeters have received higher than expected readings, which was attributed to them being passed through airport baggage scanners.

### Licence Applications and Amendments Update

- Joint Health Command radiology subject matter experts have obtained Direct Liaison Authority (DIRLAUTH) to work with ARPANSA to progress a new licence category application for deployable computed tomography radiography apparatus. When ready, the licence application will be submitted through DRSA.
- DRSA is working with SEG to develop a Section 63 request to support the use of contractors in the remediation of World War 2 munitions buried on Defence sites.
- DRSA is working to develop a Section 63 request to support replacement/upgrades for F0252 and F0300.

## General Business

- None

## Next Meeting

- It is proposed that Defence hosts the next meeting in Canberra, on or about May 2023.

## Follow Up Tasks

- No specific follow up tasks were identified outside routine business.