



Australian Government

Australian Radiation Protection and Nuclear Safety Agency

INSPECTION REPORT

Licence Holder: Department of Immigration and Border Protection (DIBP)	Licence Number: F0136
Location inspected: Brisbane, QLD	Dates of inspection: 29–30 September 2015
	Report No: R15/13530

An inspection was conducted under Part 7 of the *Australian Radiation Protection and Nuclear Safety Act 1998* (the Act). The purpose of the inspection was to assess compliance with the Act, applicable regulations, and licence conditions. The inspection was conducted as part of ARPANSA's baseline inspection programme.

The scope of the inspection included an assessment of DIBP's performance in the following areas from the baseline inspection program:

- Performance Reporting Verification
- Inspection, Testing and Maintenance
- Training
- Radiation Protection.

Background

The Container Examination Facility (CEF) is a prescribed radiation facility that encompasses a mobile linear accelerator within a fully enclosed structure dedicated to the purpose of screening sea cargo.

The inspection consisted of the review of records, interviews, and a physical inspection of the CEF.

Observations

The DIBP quarterly reports of compliance submitted to ARPANSA over the past two years were reported in a timely manner and contained relevant information, including compliance with the Act and the Australian Radiation Protection and Nuclear Safety Regulations 1999. Two events which had been reported to ARPANSA were examined and the DIBP processes involved in reporting and responding to incidents was explained to the ARPANSA inspector, these included the following:

- The maintenance of the *Container X-ray Log*
- All stoppages or interruptions exceeding 30 minutes are recorded in a *Corrective Preventative Action Report*
- For matters impacting operational performance, e.g. poor image quality, a *Customs Incident Reporting Centre Incident Report* is generated
- Incidents are also recorded by the Radiation Safety Awareness Officer (RSAO) and kept on file.

The responsibility of gathering information for inclusion on quarterly reports to ARPANSA lies with the Supervisor. The Supervisor communicates with CEF personnel and the resident linear accelerator service engineer, and also examines the above mentioned incident reporting documentation.

In relation to inspection, testing and maintenance, DIBP has in place:

- Quarterly and annual maintenance reports detailing inspection, testing and maintenance performed by the linear accelerator service engineer under contract to the supplier of the linear accelerator.
- Annual inspection and survey results reported by DIBP's consulting Radiation Safety Advisor (RSA).

Quarterly and annual maintenance reports up to two years prior to the inspection were examined by the ARPANSA inspector. All emergency stop buttons and emergency stop pull-cords had been tested. All dose rate measurements detailed in the reports were below the limits set in the relevant Radiation Health Series publication, applied as licence conditions to Facility Licence F0136. A copy of a current calibration certificate for the radiation measurement instruments used were included in the reports.

The consulting RSA's annual inspection and survey report showed that all dose rate measurements associated with the operation of the CEF were below the limits set in the relevant Radiation Health Series publication.

Customs Authorised Training Officers (CATOs) implement operator training including the safe use of radiation emitting apparatus and devices. All e-learning training modules are available on the DIBP intranet site. The ARPANSA inspector was shown a spreadsheet containing the name of each operator and the level of training attained. The spreadsheet identifies the operators that had completed training on the use of the CEF and when refresher training is due. A CAT or Team Leader conducts refresher training of personnel, and for this purpose utilises an *Operator Practical Checklist*.

The ARPANSA inspector was shown the document provided by the RSA certifying the qualifications and competency of the resident linear accelerator service engineer engaged at Brisbane CEF.

New employees and staff joining from other areas of the DIBP undergo an induction relevant to the operations of the Brisbane CEF. The induction documentation must be signed by the inductee whereby they agree to comply with DIBP requirements. Contractors deployed in the screening process undergo induction and security clearance. The ARPANSA inspector completed an induction conducted by the Team Leader.

DIBP has in place a number of instructions, guidelines and procedures (forming, in part, DIBPs plans and arrangements for managing safety) as follows:

- *Radiation Safety Management Plan (RSMP)*
- *Container X-ray Operating Procedures*
- *Scanning Hall procedures*
- *Radiation Detection Procedures*

All of the above plans and arrangements were reviewed in April 2015. In July 2015, the ACBPS was subsumed into the DIBP. The ARPANSA inspector noted that all the above documents were in a template format of the ACBPS and had not been reviewed to account for any apparent or foreseeable impacts arising from operating the CEF under the control of the DIBP.

Several scan runs of sea cargo freight were observed from within the control room. All associated warning lights and signs were found to be operational on the control panel and at the entrance doors to the scanning hall. All relevant operating procedures were located within the control room. A walk-through inspection of the scanning hall and driver waiting room was conducted. All emergency stop buttons and emergency stop pull-cords were found to be in place and well maintained. Radiation warning signs and indicator lights of appropriate type and number were located throughout the CEF.

DIBP has not always reviewed its safety documentation since the operation of the CEF came under the control and management of DIBP. For example the CEF was previously under the management and control of ACBPS and since was ACBPS subsumed into the DIBP the safety documentation still refers to ACBPS management terms, and contains the obsolete ACBPS letterhead and logos.

Findings

At the time of inspection, DIBP was compliant with the Act, the Regulations, and licence conditions.

DIBP may improve its performance by addressing the following performance deficiency:

Performance Deficiency:

1. DIBP has incompletely reviewed its safety documentation since the operation of the CEF came under the control and management of DIBP.

No written response to this report is required. It is expected that actions to address any performance deficiencies will be taken by the licence holder in a timely fashion.

This report will be published on the ARPANSA website