



Nuclear Safety Committee

Meeting Minutes

Date:	13 November 2020
Time:	10:00 to 14:45
Location:	Microsoft Teams, hosted by ARPANSA
Chair:	Dr Tamie Weaver
Members:	Ms Fay Bellis, Mr Tony Irwin, Ms Kerrie-Ann Christian, Mr Ian Drinnan, Dr Carl-Magnus Larsson, Dr John Loy, Mr Stuart Parr, Mr Don Macnab, Dr Peta Miller, Mr Peter Wilkinson, Dr Joanna Wriedt
Apologies:	None
Secretariat:	Mr Chris Nickel, Mr John Ward
Invitees:	Mr James Scott, Mr Robert Godfrey, Mr Loch Castle, Dr Samir Sakar (ARPANSA)
Observers:	None

1. Introduction

Due to travel restrictions caused by the COVID-19 pandemic this meeting was held using video conferencing methods and was shortened compared to the normal full-day meeting.

Item 1.1 Attendance and Apologies

There were no apologies for this meeting. However, due to extenuating circumstances not all members could be present for the entire meeting.

Item 1.2 Declaration of Potential Conflicts of Interests

One previously declared potential conflict of interest was raised by Mr Wilkinson, who's employer is commencing work with a licence holder. It was determined that Mr Wilkinson could participate in the discussions.

No new interests were declared at the meeting, and previously declared potential conflicts of interest are maintained by the Secretariat.

Item 1.3 Minutes of the Previous Meeting

Draft minutes of the previous meeting were circulated to members following the meeting. Member comments were addressed and the minutes have been agreed and published online.

Item 1.4 Meeting Dates

The following meeting dates were reviewed and confirmed:

- Friday, 5 March 2021
- Friday, 11 June 2021
- Friday, 12 November 2021

Item 1.5 Safety/Security Moment

A safety/security moment was presented on commissioning equipment in the health care sector. The moment highlighted dealing with multiple responsible entities, as well as human and technological factors dealing with similar physical connectors located close together.

2. Business Arising

Item 2.1 Outstanding Actions

The Committee noted that all outstanding actions were completed.

3. Correspondence

Item 3.1 Incoming Correspondence

None

Item 3.2 Outgoing Correspondence

One enquiry was responded to by the member representing the interest of the general public, see item 6.4.

4. Main Items for Discussion

Item 4.1 RPF Report

The Committee was provided with the annual assessment prepared under the Australian Government's Regulator Performance Framework (RPF). The NSC is the a ministerially approved external validator for this report.

The report was validated at the meeting, with the NSC making the following observations:

- NSC recognised ARPANSA's commitment to the RPF and continued high performance in a difficult year. This includes demonstrating agility in ensuring regulatory objectives and oversight are not compromised while supporting COVID safe work practices implemented by ARPANSA and Licence holders.
- The use of additional evidence, beyond the metrics, to supplement the evaluation against the KPIs was appropriate. This was effective in ensuring that a balanced picture was presented in the report.
- While the benefit of the RPF review process was clear during the first years following its introduction, the value of yearly reviews is now less evident. A number of long-term initiatives have

been identified and are being pursued, the effects of which would only be seen after several years. In addition to the RPF review, which focuses on efficiency, other reviews including an international peer review have also been carried out recently. As such, the frequency and focus of the RPF reviews appear to lead to improvements of only incremental value with each additional review.

Action: Secretariat to provide a copy of validation report, which includes the above comments, to the Chair for signing.

Item 4.2 Compliance Manual Update

The Committee was provided with a draft revision of ARPANSA's Compliance Manual (earlier Compliance and Enforcement Manual), which is an internal procedure document that is also published online to provide stakeholders with information on ARPANSA's approach to the promotion and enforcement of compliance with the ARPANS Act and Regulations, and with conditions of licence. While updates are being made at regular intervals, this revision also included consideration of the outcomes of the Royal Commission into Misconduct in the Banking, Superannuation and Financial Services Industry¹ (2019).

The draft document is currently undergoing stakeholder consultation. The Committee provided comments, including:

- The Committee reinforced the importance of clearly defining the regulatory intent and approach to compliance in a succinct manner. This could include using information currently in other documents and moving some of the detailed information into appendices, or similar.
- The areas of priority, as well as how the risk-based graded approach is applied, to managing non-conformances could be given increased visibility. Clarity in where effort is being placed would be particularly beneficial in the context of regulatory discretion.
- There is a potential risk for people to try to use inspection findings, such as Areas for Improvement (AFI) and minor non-compliances, 'against' the licence holder in a manner that is not consistent with the intended promotion and continuous improvement of safety outcomes. This reinforces the importance of the open and balanced reporting process and stringent internal processes.
- The internal processes should also to be carried out efficiently to ensure that workloads do not become disproportionate to the benefit introduced by increased transparency and openness.

5. Update on Major Controlled Facilities and Inspections

Item 5.1 ANSTO Nuclear Medicine (ANM) Facility

ARPANSA received a submission from ANSTO related to the conditions of the ANSTO Nuclear Medicine (ANM) facility licence regarding risk assessments, and subsequent additional information related to the revised risk assessment approach and outcomes.

The Committee was provided with: ANSTO's risk assessment methodology, risk assessment matrix, and the summary risk assessment tables.

¹ [Financial Services Royal Commission - Home](#)

From the samples of the risk documents supplied, the NSC could not be sure that ANSTO had fully considered several important aspects of risk assessment, especially in the context of lower likelihood events. These include:

- the inherent weaknesses of risk matrices, including the need for robust data available on the likelihood or frequency for the causal factors which could lead to an incident. Risk matrices can rate a low probability but high consequence event with the same descriptor as a high frequency but low consequence event. Due consideration should be given to how these two scenarios are managed and if a consequence-based approach is more appropriate for the high consequence events.
- The concept of residual risk, in the absence of the evidence of the reliability and efficacy of controls in a new facility. The level of evidence of control performance, and if this is used to assess the residual risk, was not apparent.
- Clarity on what constitutes a critical control, how are they decided upon and how are they monitored in service.

The NSC noted that these issues are similar to issues that have previously been considered by the Committee. A fundamental shift in risk assessment methodology was not clearly evident in the presented documents.

Item 5.2 Other Facilities

The Committee was provided with an overview of other relevant regulatory activities. This included the inspections, applications, and assessment of compliance of regulated facilities. A progress overview was provided on the ANSTO Health Products action plan.

ARPANSA also provided an updated of recent activities at OPAL.

6. Reports

Item 6.1 ARPANSA Significant Activities

The CEO of ARPANSA provided a brief update including information on the proposed National Radioactive Waste Management Facility (NRWMF) and the establishment of the Australian Radioactive Waste Agency (ARWA).

Item 6.2 Radiation Health and Safety Advisory Council

The minutes of the meetings can be downloaded from the [ARPANSA website](#) once published.

Item 6.3 Radiation Health Committee

A general summary of the meetings was provided, the minutes of the meetings can be downloaded from the [ARPANSA website](#) once published.

Item 6.4 Member Representing the Interest of the General Public Update

One correspondence previously raised which related to the NRWMF was responded to and formally closed off.

7. Other Business

Item 7.1 The 2021 – 2023 Triennium and Farewell to Departing Committee Members.

The Committee noted that the following members are retiring from the Committee:

Mr Don Macnab - Don has been a member of the Committee for 14 years, since 2007. He has contributed not only in his capacity as an expert in nuclear engineering but has also been active in and contributed to many discussions and documentation reviews that have helped and enhanced the quality of ARPANSA's regulatory activities.

Ms Kerrie Anne Christian - Kerrie Anne has been a member since 2012. In her nine years of service Kerrie Anne has brought expert knowledge on metallurgy and quality processes, which have been invaluable to the Committee. Kerrie Anne has also been very active in updating the Committee on news and developments of interest to the Committee and for nuclear safety in general.

Both members have provided tremendous assistance to ARPANSA over the years, with their expert knowledge and experience contributing to NSC making a number of important recommendations to ARPANSA that have significantly strengthened ARPANSA's regulatory decision-making.

Both members and their experience and input will be missed.

All other members will continue to serve for the 2021 – 2023 triennium. Recruitment to fill the vacancies after Ms Christian and Mr Macnab are at an advanced stage and the new Committee membership is expected to be announced shortly.

8. Information on Nuclear Safety Matters and Regulatory Activities

Item 8.1 Travel Reports

The Committee noted the item.

Item 8.2 Public Consultations and Publications

The committee was provided with recent ARPANSA publications and consultations.

9. Closure and Next Meeting

The meeting closed at 14:30, the next meeting is scheduled for Friday, 5 March 2021.