



Inspection report

Licence Holder: CSIRO Health and Biosecurity (H&B)	Licence Number: S0023
Location inspected: North Ryde, NSW	Date/s of inspection: 25 July 2017
	Report No: R17/08459

An inspection was conducted as part of ARPANSA’s baseline inspection program to assess compliance with the *Australian Radiation Protection and Nuclear Safety Act 1998* (the Act), the Australian Radiation Protection and Nuclear Safety Regulations 1999 (the Regulations), and conditions of the Source Licence S0023.

The scope of the inspection included an assessment of H&B’s performance at North Ryde site against the Source Performance Objectives and Criteria (PO&C). The inspection consisted of a review of records, interviews, and physical inspection of sources.

Background

H&B is authorised under section 33 of the Act to deal with controlled apparatus and controlled material.

H&B use controlled apparatus at the North Ryde site to make a positive and transformational impact in Australia through innovation in the food, health and bioproducts industries.

Observations

In general, the management of safety at the H&B facility was found to be satisfactory. In some cases, however, there appeared to be room for improvement with respect to consistency and ambiguities noted within the Radiation Protection Plan (RPP) for example: the use of the terminology ionising radiation sources and radioactive substances instead of controlled material.

In the Foreword of the RPP, it states ‘all controlled persons shall read and understand the contents of this document’; there was no evidence to show this was being done. It is important to record when personnel have read and acknowledged the requirements of a policy or procedure. This gives effect to the document.

In Section 3.5 Personal Protective Equipment (PPE) the example of eyewear for lasers should be addressed in the SWI.

Section 8 refers to ‘exceed dose limits’, however non-ionising radiation is defined by exposure limits.

Performance Reporting Verification

H&B's quarterly reports have been submitted to ARPANSA in a timely manner, and contained relevant information, including details of compliance with the Act and Regulations. Information for quarterly reports is coordinated by the Business Unit Radiation Safety Officer (BURSO) with input from each H&B site followed by consolidation into one final report to ARPANSA.

Other documentation required by ARPANSA such as Regulation 51 submissions and Regulation 53 disposal requests are also coordinated through the BURSO as needed.

Training

Persons using the controlled apparatus on the site have undertaken training related to the particular source. Training records were verified by the ARPANSA inspectors for each individual at the North Ryde site who had completed the training. All H&B staff at the North Ryde site are required to partake in induction training in order to work on-site.

Radiation Protection

H&B management has demonstrated a commitment to radiation protection by establishing a policy to facilitate the safe and effective use of radiation at the North Ryde site. This is supported by a comprehensive RPP to achieve and maintain best practice and compliance with radiation legislation and ARPANSA licence conditions. Version 6 of the RPP was published in July 2017 and a table detailing changes is included inside the front cover showing the version number, details of the changes, endorsing person, approving person and issue date.

Physical Inspection

During the inspection of the controlled apparatus, H&B appeared to be in compliance with all aspects of the Australian Standard AS2243.5:2004 *Safety in laboratories Part 5: Non-ionizing radiations- Electromagnetic, sound and ultrasound*.

Safe work instructions were sighted adjacent to the inspected controlled apparatus, each of which had been reviewed within the previous 12 months.

No work with radioactive materials, either sealed or unsealed, was being carried out at the North Ryde site of H&B nor has it been for some time.

Findings

The licence holder was found to be in compliance with the requirements of the Act, the Regulations, and licence conditions.

The inspection revealed the following **areas for improvement**:

- Review inconsistencies in the RPP.
- Implement a process to confirm controlled persons have read and understood the RPP.
- Update SWI for lasers to show appropriate eyewear.

It is expected that improvement actions will be taken in a timely manner.