



Inspection report

Licence holder: Department of Home Affairs	Licence number: S0092
Location inspected: Norfolk Island	Date/s of inspection: 16 March - 12 April 2018
	Report no: R18/03924

An inspection was conducted as part of ARPANSA's baseline inspection program. For the purposes of this inspection, the inspector did not enter the licence holder's premises; instead the inspection was conducted using documents, photographs, and records sent by the licence holder, and further clarification via phone or email as necessary.

The purpose of the inspection was 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 Source Licence S0092.

The scope of the inspection included an assessment of the Department of Home Affairs' performance against the Source Performance Objectives and Criteria.

Background

The licence holder is licensed under section 33 of the Act to deal with baggage inspection x-ray units. The units are used for the examination of baggage and packages for security and customs purposes.

The main codes and standards applicable to these sources are the [Radiation Health Series 21 \(RHS21\)](#) - Statement on cabinet X-ray equipment for examination of letters, packages, baggage, freight and other articles for security, quality control and other purposes (1987), and [Radiation Protection in Planned Exposure Situations Code 2016 \(RPS C-1\)](#) Planned Exposure Code

Observations

In general, the radiation protection measures were found to be satisfactory.

Performance Reporting Verification and Configuration Control

The details of all Home Affairs sources are maintained in the Source Inventory Workbook (SIW). The details of the baggage inspection x-ray units was consistent with the SIW.

Home Affairs is required to fulfil its reporting commitments to ARPANSA by submission of quarterly reports, in the approved format, within 28 days of the end of the quarter. The last report was submitted

within the timeframe and included information about compliance for the reporting period, and source movements in the period.

Evidence of readily available on-site procedures and work instruction was provided. However, there were some delays in supplying the organisations' Radiation Management Plan (RMP). The RMP was being re-branded. Under the planned exposure code the RMP must be developed, documented, resourced, implemented and regularly reviewed. The review must be at least every three years in accordance with ARPANS Regulation 50. This document forms a key part of the organisation's plans and arrangements on radiation safety, and as such, the document must be kept up to date and a high level of awareness of the document and its requirements maintained. Any changes, including reviews, of this document must be notified to the regulator as part of quarterly reporting. Quarterly reports indicate the document had been in a review process during the July-September and October-December 2017 Quarters. The planned updates to the Radiation Management Plan indicated in the reports were not evident in the re-branded copy provided.

Inspection, Testing and Maintenance (Servicing)

Copies of recent maintenance/service reports were provided for each machine. These reports were issued by the supplier of the x-ray unit using staff who hold current local radiation licenses. The service reports provided indicate that regular, at least annual, servicing of the units occurs, and that the testing was carried out post installation and prior to use. These service reports include the results of the radiation monitoring and confirm that checks including the functioning of the interlocks were performed without issue. While the last two years of service information could be provided, historical service information was not always readily accessible.

Training

Home Affairs requires that the personnel using the x-ray unit have received appropriate training in radiation safety and use/operation of the units, through internally delivered courses. Records were provided of authorised officers, including dates of course completion. Following successful completion of the baggage scanner use and safety training, individual users are issued with a unique login to the scanners. This ensures that only trained and authorised persons can use the x-ray units.

Security and Access Control

Access control was maintained for each baggage scanner through the use of a key and user logins described above. It was confirmed that keys are removed when the unit is not in operation and stored in B-class cabinet, to prevent unauthorised use.

Radiation Protection

All baggage scanners were fitted with indicator lights, labels, and warning signs in accordance with RHS21. Shielding consisted of flexible curtain or fixed metal shielding which was consistent, under RHS 21, with the use of the units that is for cargo scanners to which access is restricted to Home Affairs staff. Recent survey results demonstrated the shielding was effective in controlling scatter.

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**:

1. Document management – key documentation (including the RMP) was not maintained in a manner that ensures that the contained information is kept up to date, is readily accessible and known to all relevant staff.

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

No written response to this report is required

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