

Regulatory update

Lisabeth Yates

Head of Radiation Protection



UNIVERSITY OF
CAMBRIDGE

Safety Office

Ionising Radiation Regulations

Made - - - -

23rd August 1985

IRR85

- 41 regs, 10 schedules
- Roles RPA (suitable) and RPS (suitable)

IRR99

- 41 Regulations, 9 schedules
- Roles RPA (nationally accredited) and RPS (suitable + syllabus)

IRR17

- 43 regs, 9 schedules
- Notification, Registration, Consent

HSE Consents under IRR17

- One Consent for each practice within the university (individual consents not needed for each department or unit)
- Required for:
 - the deliberate administration of radioactive substances to persons and animals for the purpose of medical or veterinary diagnosis, treatment or research;
 - the exploitation and closure of uranium mines;
 - the deliberate addition of radioactive substances in the production or manufacture of consumer products or other products, including medicinal products;
 - the operation of an accelerator (except electron microscopes)
 - industrial radiography (*non-destructive testing and image of the item under test is formed...*)
 - industrial irradiation (*sterilise, process or alter structure of products or materials*)
 - work with a high-activity sealed source
 - operation, decommissioning or closure of any facility for the long-term storage or disposal of radioactive waste (including facilities managing radioactive waste for this purpose)
 - practices discharging significant amounts of radioactive material with airborne or liquid effluent into the environment

? Clarifications from regulators still needed on some of these!

HSE consents

- Consents are a system of “licenses” for certain practices
- We already have consents in place
- We will be contacted by HSE (at any time over next few years) and instructed to apply for **new consents under the new system**
 - We will be given a 3 month deadline to apply and submit the required documentation
 - HSE review documentation and visit
 - If improvements are required we have 1 month to comply
- Info available from HSE workshops, limited guidance and feedback from RPAs
- *Some issues...*
 - *Ongoing discussions on application of certain consents*
 - *“The current Safety Assessment Template is lacking detail” ... some surprises and inconsistencies*
 - *Documentation – current and original – do you have a critical examination for an X ray system installed 30 years ago?*
 - *Deadlines may be difficult to meet - “If you know that any of your control measures are not compliant, do not wait until you need to make a Safety Assessment to make any improvements – it will be too late!”*

Environment Agency

- Routine inspections continue...
 - Sealed – CTSA + EA annual visits
 - Unsealed – Addenbrooke's and Central due very soon! (likely to include review of Permits)
- Permit non-compliance reported last year
 - Stock checks showed up some significant discrepancies
 - Stocks had not been checked for several years
 - Turnover of key staff was a factor
 - => Impossible to resolve the discrepancies (despite great efforts by current RPSs!)
- RPSs MUST
 - Check stocks and samples regularly – accountancy checks are vital
 - Report problems quickly (advice from RPA/RWAs, inform Lead/Senior RPS and senior management as applicable)
 - Review security/access to stocks and samples

Unsealed source inspections

- Common issues raised
 - Old stocks and samples – annual written justification is required for retention
 - Purchasing controls
 - Labelling of stores, disposal sinks, drains (to main downpipe)
 - Contamination records –
 - state cps, not “✓”
 - expected background
 - action levels for monitor
 - list or plan of areas monitored
 - Standards of facilities
 - Training records
 - Security
- Pre-visits available, and please ensure audit actions followed up

EA and CTSA – new requirements for sealed source categories 1-4

- Review of procedural arrangements
 - More detail required
 - Improvements by next CTSA visit
- Review of physical security – doors, walls, ceilings
 - Progress assessment of existing measures (via suppliers)
 - Liaise with suppliers on available options for improvements
 - To be completed by June 2029 at the latest (but planning needed!)

Please talk to us as early as possible in the planning stages of any proposed radiation work

Office for Nuclear Regulation (ONR) - Safeguards

- Control of nuclear materials to prevent nuclear proliferation
- Application:
 - Uranium metal, alloy or compound
 - Thorium metal, alloy or compound
 - Ore containing a substance from which the above source materials can be derived
 - Plutonium 239
 - Uranium 233
- Requirements:
 - Detailed records, documented and maintained in a very specific way
 - Control of acquisitions – vital!
 - Any additions (e.g. “found” items) or discrepancies require special reporting
 - Reporting annually to regulator, very specific format

Please clear out your drawers....!



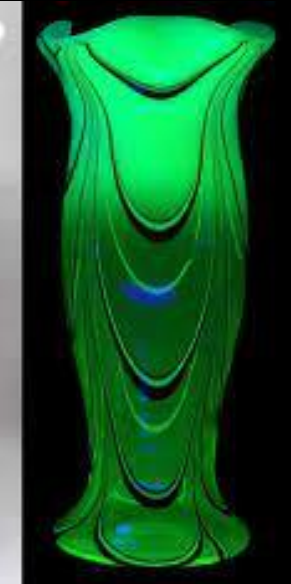
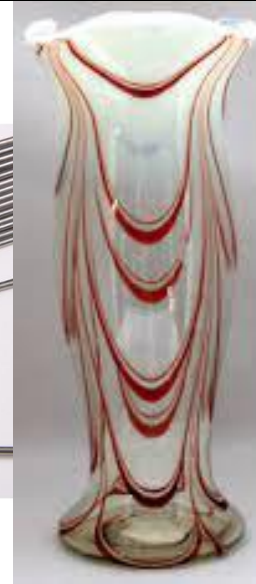
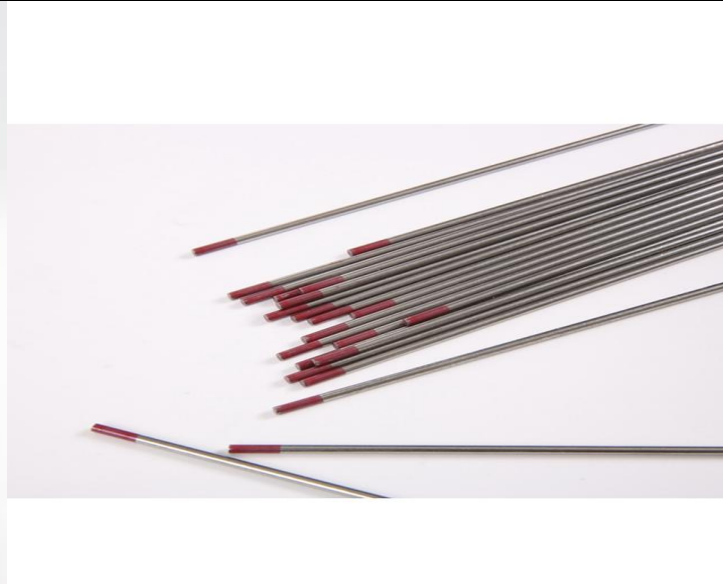
Office for Nuclear Regulation (ONR) - Safeguards

- Departments that have previously reported under Safeguards
 - Please review records now
 - We will contact you shortly

Safeguards + other regs apply (transport, safety, EPR)

Safeguards etc may apply

Safeguards does not apply, but other regs may apply



Prepared compounds

NORM

Naturally
Occurring
Radioactive
Material

Thoriated welding rods

Uranium/Vaseline glass Etc...!

Any questions?