

**Note of second meeting of the Ionising Radiation Health & Safety Forum,
held on 13 October 2004 at Rose Court, 2 Southwark Bridge, London**

Present

Chair: Dr R W Davies

Members: Dr P J Allisy-Roberts
Dr C Blackburn (for Mr S Conney)
Mrs P Brown (for Mr S Ebdon-Jackson)
Dr R Coates
Dr R Corbett
Mr P Foley
Dr J Godfrey
Mr A Hancock (for Mr A R Richards)
Dr D Harvey
Mr G Hunter
Mr R Jones
Dr V Lewington
Mr A Johnston
Ms J McSorley
Mr J Miller
Ms S Murray
Dr H Porter
Mr G Renn
Mr B Russ
Mr P Shaw (for Mr R Paynter)
Dr R Shields
Mr David Small
Mr N Starling
Mr J Stewart

Also present:

Mr D Dixon	NRPB
Ms S Mackie	HSE
Mr J Taylor	HSE

Secretariat Mr P Dickenson
Mr N Higham
Mr L Evans

Apologies Mr M Bonnett, Mr S Conney, Dr O Crawley, Mr S Ebdon-Jackson, Dr S Harbison, Dr K Harding, Mr D Jenkinson, Mr J Kane, Mr K Ledgerwood, Mr R Moore, Mr R Paynter, Mr A R Richards and Mr C Wilson

Welcome and introductions

1.1 George Hunter (SEPA) and Rowland Jones (HSENI) were welcomed to their first meeting. It was noted that Ken Ledgerwood (EHSNI) was also a new member but had sent apologies on this occasion.

Minutes of the last meeting (7 July 2003) and matters arising (M1/03)

2.1 The minutes of the last meeting were agreed without amendments.

2.2 The following actions had all been completed:

- Paragraph 1.5 - Wynne Davies had undertaken the role of chair for the past 18 months;
- Paragraph 2.2 - HSE had circulated its revised internal guidance on radon to members as an information paper in July 2003;
- Paragraph 3.2 - The final draft of the High Activity Sealed Sources (HASS) Directive and a copy of the Environment Agency (EA)'s power point presentation were circulated to members on 14 July 2003;
- Paragraph 4.1 - The weblink for the Health and Safety Commission (HSC) Strategic Plan 2004 had been circulated to members on 24 July 2003; and
- Paragraph 4.4 – The Secretariat had alerted members on 20 January 2004 about the publication of the Justification consultation document.

ICRP draft recommendations

3.1 A presentation was made to members to provide an overview of the ICRP document. This is at **Annex A**.

3.2 The following points were made in discussion:

- The NRPB was currently considering its response which, when finalised, would be posted on its website;
- Some concern was expressed at the ICRP's web-based consultation and its perceived lack of accountability, although it was recognised that the ICRP was now actively taking steps to involve others in the development process through this consultation;
- Concern about the possible implications for the ALARA/dose constraints system that worked successfully in the UK;

3.3 It was agreed that members would consider further and feed into the HSE/UK Government response to the consultation. The main issues to be addressed were if the Forum had confidence in the ICRP's recommendations; and if there is a need for a clear restatement of general principles. The potential impact on the UK regulatory system was also important. **Members would send their comments to the Secretariat by the end of November.** If there were major issues to be raised HSE should be informed as soon as practicable.

Radon – update from NRPB

4.1 The NRPB updated members on its work in this area. A copy of the presentation is at **Annex B**.

4.2 Members agreed that the profile of the risks from radon in the workplace should be raised by HSE and Local Authorities working in partnership in radon affected areas. The partnership approach could be extended to include others with an interest, eg Trade Unions. There was a potentially significant health issue to be addressed. It appeared that some 10-15% of workplaces could be subject to radon above the action level set out in IRR99.

4.3 HSE explained that it would not be able to increase its resources in this area but considered that a holistic approach, involving others in Government and elsewhere, could help to address this issue for both workplaces and domestic premises. It was a matter of raising awareness in potentially affected premises. It was likely that others might be better placed than HSE to get the main messages across. HSE agreed to provide details of proposed changes to the Building Regulations (on which ODPM has the lead) relating to radon and new builds. **The Forum asked HSE to consider the options for further action and to report back to its next meeting.**

Compliance issues and areas of concern – issues raised by field inspectors

5.1 HSE's Field Operations Directorate provided an update on its current work priorities on non-nuclear sites, areas of concern and its strategy for addressing them. A copy of the presentation is attached at **Annex C**. HSE's Nuclear Installations Inspectorate (NII) had commissioned a study of nuclear site licensees' compliance with IRR99. This would be completed in 2006 and its findings inform NII's future regulatory strategy.

Recent and future developments

6.1 HSE outlined the current HSC/E strategy for the health and safety system, with its increased emphasis on strategic programmes and health (as opposed to safety) at work. The strategy would involve close partnership working with stakeholders, though enforcement action would always remain as an essential tool for HSE. HSE would be increasingly focused on the delivery of published targets. The Hampton Review, due to report in 2005, may also have an impact on how HSE goes about its work in the future.

6.2 Members were also informed about:

- The EC's work on reviewing the training requirements for qualified experts (RPAs in UK). The aim being to harmonise the requirements.

- The EC's funding of initial work on a review of the implementation of the Outside Workers Directive in Member States, and its potential implications for a further BSS Directive.
- The decision not to proceed with proposals for a nuclear package Directive.
- That work on the proposed Amendment Regulations to IRR99 had not been taken forward in view of an HSE review of all its legislative proposals. It was unlikely that this would now proceed.

6.3 An update was provided on the current state of play regarding the arrangements to support the Justification of Practices Involving Radiation Regulations 2004. The note provided by Defra is attached at **Annex D**. Defra would now be taking forward proposals for contaminated land regulations.

6.4 Members were informed about the current state of play on implementation of the High Activity Sealed Sources (HASS) Directive. It had been finalised in December 2003 and the Member States had to transpose it into law by the end of 2005. Defra was taking the lead and preparing draft implementing regulations under the EC Act 1972. These regulations would amend, inter alia, the Radioactive Substances Act (RSA) 93. Enforcement would mainly fall to the environment agencies.

6.5 SEPA, DfT, DoH, FSA and NRPB also provided updates.

Guidance documents – discussion

P1/04

7.1 Members discussed paper **P1/04** and in particular their concerns at the delay in HSE publishing the revised PM77 (also known as HSG226) which had been held up by HSE's moratorium on publications. HSE explained that the moratorium had been a necessary part of its review of its communications strategy – HSE had been producing too many publications that did not sit well with its overall aims. The moratorium had now been lifted and HSE would in future only publish a more limited range of guidance linked to its published strategy. In addition, it would look to stakeholders to publish where appropriate and provide a 'free' web based route. The details were still being finalised. It was confirmed that the revised PM77 would be published as either a priced publication or a free web-based document. **The Forum asked that HSE carry out a third round of consultation on the revised PM77, and specifically that Forum members should be consulted.**

7.2 Members agreed that the Forum's role was to identify areas where further guidance was needed. It would then be for consideration as to which publication route would be best. Members considered that where guidance was not published by HSE it would be desirable for suitable guidance to be 'endorsed' by HSE.

RPA certification

8.1 HSE informed members that it would be carrying out a review of the HSE Statement on radiation protection advisers now that it had been in operation for some four years. A consultation paper with HSE's proposals would be published in the new year.

The future basis of the Forum's membership

9.1 Members discussed whether to expand the Forum's membership in the light of a number of requests for membership from individuals and organisations not already represented. It was agreed that the Forum should retain its core membership as presently constituted but that consideration should be given to holding an open meeting in 2005. Members expressed some concerns about holding a completely 'open' meeting but agreed to test the water in 2005. **It was agreed that HSE should invite expressions of interest from those wishing to attend the next meeting.** The Secretariat would keep a list of those wishing to attend and, depending on the numbers, a decision could then be made as to the format and handling of the next meeting.

Any other business

10.1 The Chair updated the Forum on the work of the Committee on Radiation Waste Management (CoRWM). The presentation is attached at **Annex E**.

10.2 The Forum agreed that **the TUC members would provide the Chair for the coming year.**

Date of next meeting

11.1 It was agreed that the next meeting would take place a month or so after the ICRP's final version of the Recommendations is published, or October 2005 (whichever date comes first).

**Secretariat
November 2004**