

**Note of third meeting of the Ionising Radiation Health & Safety Forum,
held on 22 March 2006 at Rose Court, 2 Southwark Bridge, London**

Present

Chair: Dr Hamish Porter Amicus - Edinburgh Cancer Centre
Western General Hospital, Edinburgh (TUC)

Members:

Dr Penny J Allisy-Roberts OBE	Bureau International des Poids et Mesures, Sèvres (Professional Societies)
Ian Chell	Department of Health
Stuart Conney	Food Standards Agency
Giles Denham	Health and Safety Executive
Christine Edwards	University of Central Lancashire - AURPO [Association of University Radiation Protection Officers](Research & teaching)
Dr John Godfrey	National Consumer Council (Public interest)
Dr David Harvey	Corus UK Ltd (CBI)
George Hunter	Scottish Environment Protection Agency
John Kane	GMB (TUC)
Ken Ledgerwood	Environment & Heritage Service, Northern Ireland
Dr Val Lewington	Southampton University Hospitals NHS Trust (Professional Societies)
John Miller	Amicus AEEU (TUC)
Susan Murray	TGWU (TUC)
Richard Paynter	Health Protection Agency
Maurice Phillips (for Roger Moore)	Ministry of Defence
Dr Christine Reek (for Dr Robert Corbett)	(Professional Societies)
Guy Renn	Prospect (TUC)
Ian Robinson	Member of EC's Article 31 Group of experts
Bob Russ	Environment Agency
Dr R Shields	Manchester Royal Infirmary (Professional Societies)
David Small	CET Medway Ltd – BINDT [(British Institute of Non-Destructive Testing] (Small businesses)
Dr John Stather	Health Protection Agency and Member of EC's Article 31 Group of experts
Jim Stewart	Dept for Transport
Richard Wakeford	Member of EC's Article 31 Group of experts

Also present:

Simon Morgan	United Kingdom Nirex Ltd
Dr David Smith	DSTL Radiological Protection Services
Hugh Wilkins	Royal Devon & Exeter Hospital
Simon Wright	NDT Maincal Ltd

Daryl Dixon	Health Protection Agency
Gareth Thomas	Health and Safety Executive
James Taylor	Health and Safety Executive
Martyn Van Lancker	Health and Safety Executive

Secretariat:

Jane Lumb	Health and Safety Executive
Laurence Evans	Health and Safety Executive

Apologies:

Peter Foley	Derbyshire Dales District Council (Local Authority Associations)
Dr Robert Corbett	Hairmyres Hospital, East Kilbride (Professional Societies)
Dr Owen Crawley	Welsh Assembly Government
Dr Wynne Davies	Consultant in Radiation Protection, Nuclear Safety and Radioactive Waste (CBI)
Roger Moore	Ministry of Defence
Jean McSorley	Greenpeace (Non-Governmental Organisation)
Chris Wilson	Dept for Environment, Food & Rural Affairs

Welcome and introductions

1.1 The Chair welcomed everyone to the meeting, in particular the four Open meeting guests.

Minutes of the last meeting (13 October 2004) and matters arising (M1/04)

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

2.2 The following actions had been completed:

- paragraph 3.3 – members comments on the draft International Committee for Radiation Protection (ICRP) recommendations were fed into the HSE/UK Government response to the ICRP consultation;
- paragraph 4.3 – HSE provided an update in relation to work on radon under item 9;
- paragraph 7.1 – In relation to the guidance document PM77, HSE explained why they had not undertaken a third round of consultation;

- paragraph 9.1 – HSE had invited expressions of interest from those wishing to attend this Forum meeting and as a result four guests were present at this Open meeting; and
- paragraph 10.2 – Dr Hamish Porter had been the chair of the Forum over the past year.

Update on the ICRP recommendations

3.1 Dr John Stather (Member of EC's Article 31 Group of experts) provided an update of the ICRP recommendations (**Annex A**).

3.2 The following points were made in discussion:

- members welcomed that it was unlikely that the new ICRP recommendations would lead to any significant changes to the International Atomic Energy Agency (IAEA) Basic Safety Standards (BSS): countries that had complied with the earlier recommendations, ICRP 60, may not need to amend their national regulations;
- members noted the proposed timescales. The new Recommendations should be published in 2007 following a second round of consultation in 2006;
- members felt that there was a danger of ICRP watering down the concept of ALARA, which they felt was central to radiation protection in the UK; and
- there was also concern that the new Recommendations should be written in a clear way that would be understandable for lay people. Members were assured that HPA – RPD would be producing some guidance on the new ICRP Recommendations.

Internal dosimetry

4.1 Dr John Stather (Member of EC's Article 31 Group of experts) provided an update on current work on internal dosimetry in ICRP. The organisation had published a number of guidance documents in this area and was looking at issues in relation to internal dosimetry. Future work would involve:

- a review of biokinetic data and an update of models;
- dose coefficients for intakes of various chemical forms of radionuclides;
- guidance on the interpretation of bioassay data; and
- a series of publications on occupational intakes of radionuclides.

UNSCEAR – the United Nations Scientific Committee on the effects of atomic radiation

5.1 Dr John Stather gave a presentation (**Annex B**) on UNSCEAR's background, membership and current work programme. The outcome of UNSCEAR's programme of work would be published in a number of reports

and a summary document. It was likely the first publication would be ready for publication by the end of 2006.

Revision of radiation protection directives

6.1 Jane Lumb, Health and Safety Executive, informed members (presentation at **Annex C**) that the European Commission intended to bring a number of Ionising Radiation Directives together into one Directive and review the BSS Directive at the same time. Negotiations might begin in 2008 with possible implementation of the new Directive in 2012. HSE was preparing to feed into the process in collaboration with other government departments.

6.2 The following points were made in discussion:

- the IAEA was also reviewing its BSS, Ian Robinson was the UK representative on this committee;
- concern was raised in relation to the Outside Workers Directive: the review would consider whether category B workers might fall within the scope of this Directive and this could lead to problems in hospitals. The key issues in relation to the review of the Outside Workers Directive was to meet the safety objectives and look at opportunities to eliminate unnecessary bureaucratic arrangements;
- in relation to the Article 31 Groups of Experts, members were reminded that the Experts were independent scientific experts and as such national authorities could inform their country's experts, but were not allowed to influence them. Members were referred to the Code of Ethics which was available at the following web link: http://europa.eu.int/comm/energy/nuclear/radioprotection/doc/art31/procedure_rules_en.pdf; and
- the Department of Transport were asked to provide to Secretariat the web link to the transport regulations website. They have supplied the following information:
 - the transport of dangerous goods by road in the UK is governed by the Great Britain regulations (Statutory Instrument 2004 No 568: The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2004 <http://www.hse.gov.uk/cdg/newregs.htm> and Statutory Instrument 2005 No.1732: The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment (Amendment) Regulations 2005 (Further details regarding Statutory Instrument 2005 No.1732 should shortly be available from our website: http://www.dft.gov.uk/stellent/groups/dft_freight/documents/divisionhomepage/035313). Access can be gained to an online version of the 2005 edition of ADR via <http://www.unece.org/trans/danger/publi/adr/adr2005/05ContentsE.html> . It is downloadable in chunks. However, it is **not** advisable to print this out as it is very bulky and will exhaust your paper. The 2005 version of ADR is also available in book/CD-Rom format from The Stationary Office Ltd Tel: 0870 6005522:ISBN number: 92-1-139097-4.

- Both these Regulations are based on the 2-volume European Agreement Concerning the International Carriage of Dangerous Goods by Road ("ADR"), published by the United Nations. Parallel regulations in Northern Ireland.

Revision of the HSE Statement on radiation protection advisers

7.1 Laurence Evans, Health and Safety Executive, provided an update (**Annex D**) on HSE's review of the HSE Statement on Radiation Protection Advisers (RPAs).

7.2 The following points were made in discussion:

- BNFL had withdrawn as an Assessing Body due to a variety of reasons: confidence that RPA2000 could carry out all RPA assessment work, whilst the change in structure of BNFL and the need for fewer RPAs than first anticipated also contributed to BNFL's decision to withdraw; and
- that guidance on suitability be circulated to members when this became available. Members recommended also that simple guidance should be provided on the role of the radiation employer and an article on suitability should be published in RP News. HSE stated that they did not consider it their role to produce all this guidance – industry bodies were better placed to provide specific guidance for their members.

Radon – update from HPA

8.1 Daryl Dixon, Health Protection Agency (HPA), provided members with an update (**Annex E**) on HPA-RPD's work in relation to radon, and in particular on HPA-RPD's 5 point plan which was a practical guide to employers to address radon problems in the workplace.

8.2 The following points were made in discussion:

- the main concern was how to increase the proactivity and interest of some employers;
- in particular, action was needed to ensure that contractors were aware of the risks to their employees and the measures that would need to be taken to ensure their compliance;
- HPA-RPD would distribute the 5 point plan to local councils and might also tailor it to specific sectors.

Radon – update from HSE

9.1 Gareth Thomas, Health and Safety Executive, provided members with an update (**Annex F**) on HSE's work on radon.

9.2 Members strongly supported the initiatives in Health and Safety Executive's Field Operations Directorate Radiation Team's (FOD RT) 2005-10 action plan and wished to place on record that HSE should ensure that sufficient funding was allocated to this work.

Airport scanning equipment - potential exposure to ionising radiation of operators.

10.1 The following points were made in discussion:

- HSE believed that the current regulatory arrangements under IRR99 were both suitable and sufficient to deal with the risks represented by airport scanning equipment. Moreover, the dose delivered to persons scanned was extremely low: in a single exposure, the dose was 30 nanoSieverts. In view of concerns raised, HSE had already inspected some of these scanners and more inspections were planned;
- despite the above, there was a lot of concern amongst employees who operated such equipment and fear of exposure was increasing stress levels;
- a US presidential report http://www.fda.gov/ohrms/dockets/ac/03/briefing/3987b1_pres-report.pdf had concluded that the risks to health posed by this equipment were very low; and
- although not yet updated to include the new personnel backscatter machines, the general information contained in the HPA Radiation at Work leaflet on Security Inspection Cabinets http://www.hpa.org.uk/radiation/publications/educational/radiation_at_work/index.htm (available in hardcopy only) applies, in that security staff should be exposed to radiation levels as low as reasonably achievable.

10.2 **The Chair asked the various experts on the Forum to forward to Secretariat details of web links mentioned during the discussion. HSE to consider placing some simple guidance on its ionising radiation webpages with appropriate links to other documents. HSE was asked to consider publishing an article in RP News, to include HSE's simple guidance on airport scanning equipment.**

Guidance documents – PM77

11.1 Members welcomed the publication on the internet of the third edition of HSE's Guidance Note PM77 'Equipment used in connection with medical exposure' (<http://www.hse.gov.uk/radiation/ionising/exposure.htm>).

11.2 The Department of Health (DoH) would review their guidance on IRMER.

Recent and future developments

Report from the Health and Safety Executive

12.1 Giles Denham provided members with an update on strategic developments in HSE:

- HSE had to focus on its work with local authorities;
- government was requiring all regulators to look at their regulations in order to reduce administrative burdens on businesses without adversely impacting on health benefits; and
- HSE was increasing staffing resource to deal with occupational health issues in order to improve workplace health. Assistance was being provided to SMEs in this area with a greater focus on 'sensible risk management'.

12.2 James Taylor made members aware of Health and Safety Executive's Field Operations Directorate Radiation Team's (FOD RT) new team structure and the team's main categories of work and key priorities (presentation at **Annex G**). Possible solutions to deal with poor compliance with IRR99 in certain industry sectors were outlined together with a number of future challenges that FOD RT would have to address.

12.3 Jane Lumb provided an update from a policy perspective. The main discussion surrounded the radiation policy delivery team's consideration of whether to go ahead with a review of IRR99. A number of members felt that it was unlikely such a review would be required, but looked forward to details of the outcome of the policy teams' considerations on this matter.

Reports from the Environment Agencies

12.4 Bob Russ, Environment Agency (EA), provided members with an update on the High Activity Sealed Sources (HASS) regulations that came into force in 2005. The main changes, for users of HASS sources, was the need to provide for disposal of the source at the time of purchase and the necessity for financial provision to be made where there was no return agreement. The Environment Agencies were setting up systems to ensure tracking of transfer of sources: each agency would have a HASS inventory held on common software, with a common form of database that would include a degree of data sharing/update.

12.5 The Environment Agencies were the principal regulators of HASS and were all trying to minimise additional burdens on businesses. Application forms, e-guidance and electronic reporting forms were all available on EA's website.

12.6 EA were also actively involved in the surplus source disposal programme. Government had helped subsidise a disposal programme which identified a small number of high risk / high activity sources and large numbers of lower risk / lower activity sources.

12.7 Considerable organisational changes had been undertaken by EA in relation to the regulation of non-nuclear premises. From 100 inspectors in 22 teams carrying out limited work on radioactivity, there were now 7 teams with 40 inspectors primarily dedicated to radioactive substances work, with a further 4 specialist inspectors. The result was a 20% increase in resource dedicated to radioactive substances work. The benefits from this change were improved inspector competence, consistency and efficiency as well as more resource for radioactive contaminated land issues.

12.8 George Hunter, Scottish Environment Protection Agency (SEPA), provided a brief update. In order to liaise with its non-nuclear customers SEPA was setting up a liaison group for small users.

12.9 Members were reminded of the NetRegs team whose role was to provide guidance on health-related regulations in layman terms. The NetRegs website is at www.netregs.gov.uk. It has a section on radon under 'construction' and also has links to HPA.

[Note for members - The NetRegs website is free to use and is regularly updated. Its aim is to help small and medium-sized enterprises in the UK to understand the complex environmental regulations that can affect them. The site provides guidance on how to comply with environmental law as well as advice on good environmental practice.]

12.10 The following points were made in discussion in relation to the updates provided by the Environment Agencies:

- an update on the latest situation in relation to import / export licenses could be better provided by David Jenkinson at DTI; and
- EA were working closely with the Counter Terrorism Security Advisers when issuing licenses and had to take their comments on board in relation to security measures.

Report from the Department for Transport (DfT)

12.11 Jim Stewart informed members that the Road and Rail transport regulations would come under a new set of regulations, with REPPIR requirements to be included as well. The aim was to publish the new regulations by July 2007.

12.12 The IAEA had decided that there was no safety reason to issue new IAEA transport regulations

Report from Department of Environment, Food and Rural Affairs (DEFRA)

12.13 A written reply in relation to the justification for the sorting of dustbin waste containing radioactive material has been provided under item 13(i).

Report from the Department of Health (DoH)

12.14 Ian Chell updated the Forum on health issues that were now devolved. The Health Protection Agency would now be advising not only DoH, but also the Devolved Administrations (DAs) on health issues. In England, the Health Care Commission would take over the regulation of hospitals. The DAs were looking at this issue in relation to both Scotland and Wales. DoH would however keep the policy lead on health issues.

Report from Dr Wynne Davies on the Committee on Radioactive Waste Management (CORWM)

12.15 Dr Davies had provided a written update on CORWM's work programme which had reached its third phase. This update had been previously circulated to members. CORWM's draft recommendations were expected to be made available to the public and stakeholders for review and comment during May 2006. The final report would be submitted to sponsoring departments before the end of July.

Any other business

Sorting of dustbin waste containing radioactive material – is this justified?

13.1 In response to the question as to whether the sorting of dustbin waste containing quantities of radioactive material was a new class or type of practice, and whether it was justified under the Justification of Practices Involving Ionising Radiation Regulations 2004, DEFRA had provided a written response prior to this Forum meeting. The first thing to establish was whether this class or type of practice had taken place anywhere in the UK prior to 13 May 2000. If so, then it was not a new class or type of practice that needed justification under the 2004 Regulations. The type or class could be defined widely, 'sorting / recycling' could be a class or type rather than 'sorting / recycling of dustbin waste'.

Chair for the next Forum meeting

13.2 Members agreed that Dr Allisy-Roberts would chair the next meeting.

Date of next meeting

14.1 The next meeting would normally take place in a year's time, depending on sufficient agenda items.

Secretariat
September 2006